

COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 16 September 2002Identification Number PAD048603005Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Monday September 16, 2002 by Gerry Radomski, Waste Management Specialist with the Department.

The following observations were noted:

- 1) Both of the treated leachate lagoons and the raw leachate lagoon were nearly empty. The liners of these lagoons determined to be leaking by BSD have not been repaired.
- 2) Neither the main flare nor the temporary candle flares were operating during the inspection. There was a moderate landfill gas odor noted in the area of the flares.
- 3) The landfill cover at the pit previously used for leachate recirculation has not been repaired.

The following violations were noted:

- 1) By failing to repair the cover at the leachate recirculation pit, BSD has failed to maintain the integrity of the landfill cover. This is contrary to 40 CFR §§ 265.111 and 265.310(b)(1).
- 2) By failing to repair the leachate lagoon liners and by failing to collect and flare gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment.

In summary, two violations were noted during the inspection. A copy of this report was mailed to the facility operator on the date noted below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed on 9/19/2002

Date

Inspector (signature) Gerry Radomski

Date

9/19/02Page 2 of 2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT/DATA ENTRY

Site I.D. # PIAD1048603005Telephone # 610-458-5300Site Name BOYERTOWN SANITARY DISPOSALOperator Name WARREN FRAMEAddress 300 MERKEL ROADAddress 1205 POTTSTOWN PIKEGILBERTSVILLE, PA 19525GLENMORE, PA 19343Municipality DOUGLASS TWPCounty MONTGOMERYResponsible Official WARREN FRAMETitle OWNER

Person Interviewed _____

Title _____

Inspector GERRY RADOMSKITime 11:00 - 12:30

Date	Inspection Date	Inspection Type	Facility Type	Inspector Number	# Violation
09/18/02	09/19/02			2137	02

Comment

Sample # Low Sample # High

Monitoring Points Sampled

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

INSPECTION TYPE

01 Routine	10 Survey
02 Spill response	11 Part B
03 Remedial Action	12 Complaint
04 Follow Up	13 Withdrawn
05 Crit Stage	14 Closure
06 Sample Only	15 Post Closure
07 Permitting	16 Form 4
08 Superfund	17 Form 4 w/sample
09 Ground Water	50 Record Rev
	99 Other

FACILITY TYPE

Municipal	Residual	Hazardous
01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Construction/Demolition Landfill	07 Demolition	02 Treatment
03 Processing	08 Processing	03 Storage
04 Incinerator	09 Incinerator	04 Transporter
05 Surface Application	10 Surface Application	05 Permit by Rule
	11 Surface Impoundment	06 Generator
	12 Surface Injection Well	07 SQG
	13 Generator	08 RRR
	14 SQG	09 Other
		50 Superfund



COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 14 August 2001Identification Number PAD048603005Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Tuesday August 14, 2001 by Gerry Radomski, Solid Waste Specialist with the Department.

The following observations were made:

- 1) Both treated leachate lagoons were nearly full with approximately two feet of freeboard. The raw leachate lagoon had more than the required two feet of freeboard. The liners of these lagoons determined to be leaking by the facility have not been repaired.
- 2) The main flare was not running during the inspection. The temporary candle flares at the rear of the landfill were not burning during the inspection. There was a minor landfill gas odor noted during the inspection.
- 3) The leachate seeps in the landfill cover along and above the treatment facility fenceline have been repaired.
- 4) The landfill cover at the pit previously used for leachate recirculation has not been repaired.

The following violations were noted:

- Note: these violations were originally reported in the 9/11/00 inspection and remain outstanding*
- 1) By failing to repair the cover at the leachate recirculation pit, BSD has failed to maintain the integrity of the landfill cover This is contrary to 40 CFR §§ 265.111(c) and 265.310(b)(1).
 - 2) By failing to repair the leachate lagoon liners and by failing to collect and flare the gas from the landfill , BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR § 265.111(b).

A copy of this report was mailed to Mr. Frame on the date indicated below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed August 15, 2001

Date _____

Inspector (signature) Gerry RadomskiDate 2/15/01Page 2 of 2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT/DATA ENTRY

Site I.D. # 1P1A101048603005
 Site Name BOYERTOWN LANDFILL
 Address 300 MERKEL RD
GILBERTSVILLE PA 19525
 Municipality DOUGLASS TWP
 Responsible Official WARREN FRAME
 Person Interviewed _____
 Inspector GERRY RADOMSKI

Telephone # 610-458-5300
 Operator Name WARREN FRAME
 Address 1205 PATTSTOWN PIKE
GLENMORE PA 19343
 County MONTGOMERY
 Title OWNER
 Title _____
 Time 12:00 - 12:30

Date	Inspection Date	Inspection Type	Facility Type	Inspector Number	# Violation
081501	081901			2137	02

Comment

Sample # Low Sample # High

Monitoring Points Sampled

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

INSPECTION TYPE

FACILITY TYPE

01 Routine	10 Survey
02 Spill response	11 Part B
03 Remedial Action	12 Complaint
04 Follow Up	13 Withdrawn
05 Crit Stage	14 Closure
06 Sample Only	15 Post Closure
07 Permitting	16 Form 4
08 Superfund	17 Form 4 w/sample
09 Ground Water	50 Record Rev
	99 Other

Municipal

01 Municipal Waste Landfill
 02 Construction/Demolition
 Landfill
 03 Processing
 04 Incinerator
 05 Surface Application

Residual

06 Landfill
 07 Demolition
 08 Processing
 09 Incinerator
 10 Surface Application
 11 Surface Impoundment
 12 Surface Injection Well
 13 Generator
 14 SQG

Hazardous

01 Disposal
 02 Treatment
 03 Storage
 04 Transporter
 05 Permit by Rule
 06 Generator
 07 SQG
 08 RRR
 09 Other
 50 Superfund



COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11 September 2000Identification Number PAD048603005Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Monday September 11, 2000 by Gerry Radomski, Solid Waste Specialist with the Department.

The following observations were made:

- 1) Both treated leachate lagoons were nearly empty. A BSD employee was cleaning the liners with a water hose. The liners were being cleaned in order for inspection and any necessary repairs. Several holes were noted in the liners.
- 2) The raw leachate lagoon had more than the required two feet of freeboard.
- 3) The leachate seeps around the treatment facility were dry at the time of the inspection. The landfill cover at the pit previously used for leachate recirculation has not been repaired.
- 4) The flare was not running during the inspection. The gas risers at the rear of the landfill remain unconnected to the gas collection and flaring system.

The following violations were noted:

- 1) By failing to repair the leachate seeps and the cover at the leachate recirculation pit, BSD has failed to maintain the integrity of the landfill cover. This is contrary to 40 CFR §§ 265.111(c) and 265.310(b)(1).
- 2) By failing to repair the leachate seeps and the holes in the raw leachate lagoon liners and by failing to collect and flare the gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR § 265.111(b).

A copy of this report was mailed to Mr. Frame on the date indicated below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed September 12, 2000

Date _____

Inspector (signature) Gerry RadomskiDate 9/12/00Page 2 of 2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 9/11/00 Time start 11:30 Time finish 13:30
Name of Inspector GERRY RADOMSKI
Company, installation name BOYERTOWN SANITARY DISPOSAL CO.
Location 300 MERKEL RD BOYERTOWN, PA 19525
County MONTGOMERY Municipality DOUGLASS TWP
Identification number PAD048603005
Name of responsible official WARREN FRAME
Title OWNER
Mailing Address 1205 POTTSTOWN PIKE GLENMORE, PA 19343
Area code and telephone number 610-458-5300
Name of person interviewed _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☒ Disposal

Check all that apply:

- | | | |
|---|--|--|
| <input type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 12 November 1997Identification Number PAD048603005, 100550Company/Facility/Site Name Boyertown Landfill

A routine inspection of Boyertown Landfill was conducted on Wednesday, November 12, 1997, by John Mital and Kevin Bauer, Solid Waste Specialists.

The following observations were made:

- 1) The raw leachate lagoon appeared to have four to five feet of freeboard. Treated lagoon B also had four to five feet of free board. Treated lagoon A had a ripped liner and appeared to be empty.
- 2) The flare shed has fallen down.
- 3) Three gas recovery pipes have been broken off on the southern side of the landfill. A landfill gas odor was detected in this area of the landfill.
- 4) The pits at the top of the landfill have been filled in with soil.
- 5) The landfill was inspected for any leachate seeps along its slopes. No seeps were discovered.
- 6) Waste Management leases space on the landfill and operates a recycling center and container storage site on the leased land.

Just before leaving the site Mr. Warren Frame arrived on site. I explained the purpose of our visit to Mr. Frame and discussed our findings with him.

On Thursday, November 13, 1997, I phoned Jim Brady, Berks-Montgomery Municipal Authority, to determine when leachate was last discharged from Boyertown Landfill. Mr. Brady stated that the last time Boyertown Landfill discharged was on June 25, 1997(52,132 gallons). He then went on to say that Mr. Frame has to pay his bill and have tests done before he will be able to discharge again.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to ownerDate 20 NOV 97Inspector (signature) [Signature]Date 13 NOV 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT/DATA ENTRY

Site I.D. # 1100550
Site Name Bayertown Landfill
Address 300 Merkel Road
Gilbertsville PA 19525
Municipality Dayless Twp
Responsible Official Warren Frame
Person Interviewed _____
Inspector John Mital

Telephone # 610 458-5300
Operator Name Warren Frame / Tristate Environments
^{mailing} Address 1205 Pottstown Pike
Glenmoore PA 19343
County Montgomery
Title Owner
Title _____
Time 1100AM

Date	Inspection Date	Inspection Type	Facility Type	Inspector Number	# Violation
1111297	1111297	01	06	2124	00
Comment	QUARTERLY INSPECTION				

SP 124
mpz

see in
part

Sample # Low Sample # High

Monitoring Points Sampled

INSPECTION TYPE

01	Routine	10	Survey
02	Spill response	11	Part B
03	Remedial Action	12	Complaint
04	Follow Up	13	Withdrawn
05	Crit Stage	14	Closure
06	Sample Only	15	Post Closure
07	Permitting	16	Form 4
08	Superfund	17	Form 4 w/sample
09	Ground Water	50	Record Rev
		99	Other

FACILITY TYPE

Municipal		Residual		Hazardous	
01	Municipal Waste Landfill	06	Landfill	01	Disposal
02	Construction/Demolition	07	Demolition	02	Treatment
	Landfill	08	Processing	03	Storage
03	Processing	09	Incinerator	04	Transporter
04	Incinerator	10	Surface Application	05	Permit by Rule
05	Surface Application	11	Surface Impoundment	06	Generator
		12	Surface Injection Well	07	SQG
		13	Generator	08	RRR
		14	SQG	09	Other
				50	Superfund

COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 16 September 2003Identification Number PAD048603005Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Tuesday September 16, 2003 by Gerry Radomski, Waste Management Specialist with the Department.

The following observations were noted:

- 1) Both of the treated leachate lagoons and the raw leachate lagoon had the 2 feet of required freeboard. The liners of these lagoons determined to be leaking by BSD have not been repaired.
- 2) Neither the main flare nor the temporary candle flares were operating during the inspection. There was a moderate landfill gas odor noted in the area of the flares.
- 3) A new gas destruction system is in the process of being installed at the rear of the landfill near the temporary flares.
- 4) BSD has not submitted to the Department quarterly groundwater monitoring results for the second quarter of 2003.

The following violations were noted:

- 1) Failure to report to the Department the quarterly groundwater monitoring results for the second quarter of 2003 for the parameters listed in 40 CFR § 264.98. This is contrary to 25 Pa Code § 264a.97(2)(ii).
- 2) By failing to repair the leachate lagoon liners and by failing to collect and flare gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR §§ 265.111

In summary, two violations were noted during the inspection. A copy of this report was mailed to the facility operator on the date noted below.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed on 10/10/2003

Date _____

Inspector (signature) Gerry RadomskiDate 10/10/03Page 7 of 7

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name B50C ID Number PA0048603005 Date 9/16/03

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Run-on diverted away from the facility	265.302(a)(1)	H425
X				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
X				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
		X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	X			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435



Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
	X			Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
	X			Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
	X			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
	X			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
		X		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
	X			Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
			X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
X				Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
X				Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
		X		Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
		X		Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name B.SOC ID Number PA0098603005 Date 8/16/03

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
	X			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
		X		Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
		X		Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#1279504

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection 9/16/03 Time start _____ Time finish _____
Name of Inspector GERRY RADOMSKI
Company, installation name BOYERTOWN SANITARY DISPOSAL CO. BSOC
Location 300 MERKEL ROAD
County MONTGOMERY Municipality DOUGLASS TWP
Identification number PAD048603005
Name of responsible official WARREN FRAME
Title PRESIDENT
Mailing Address 1205 POTTSTOWN PIKE GLENMORE, PA 19343
Area code and telephone number _____
Name of person interviewed _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☐ Disposal

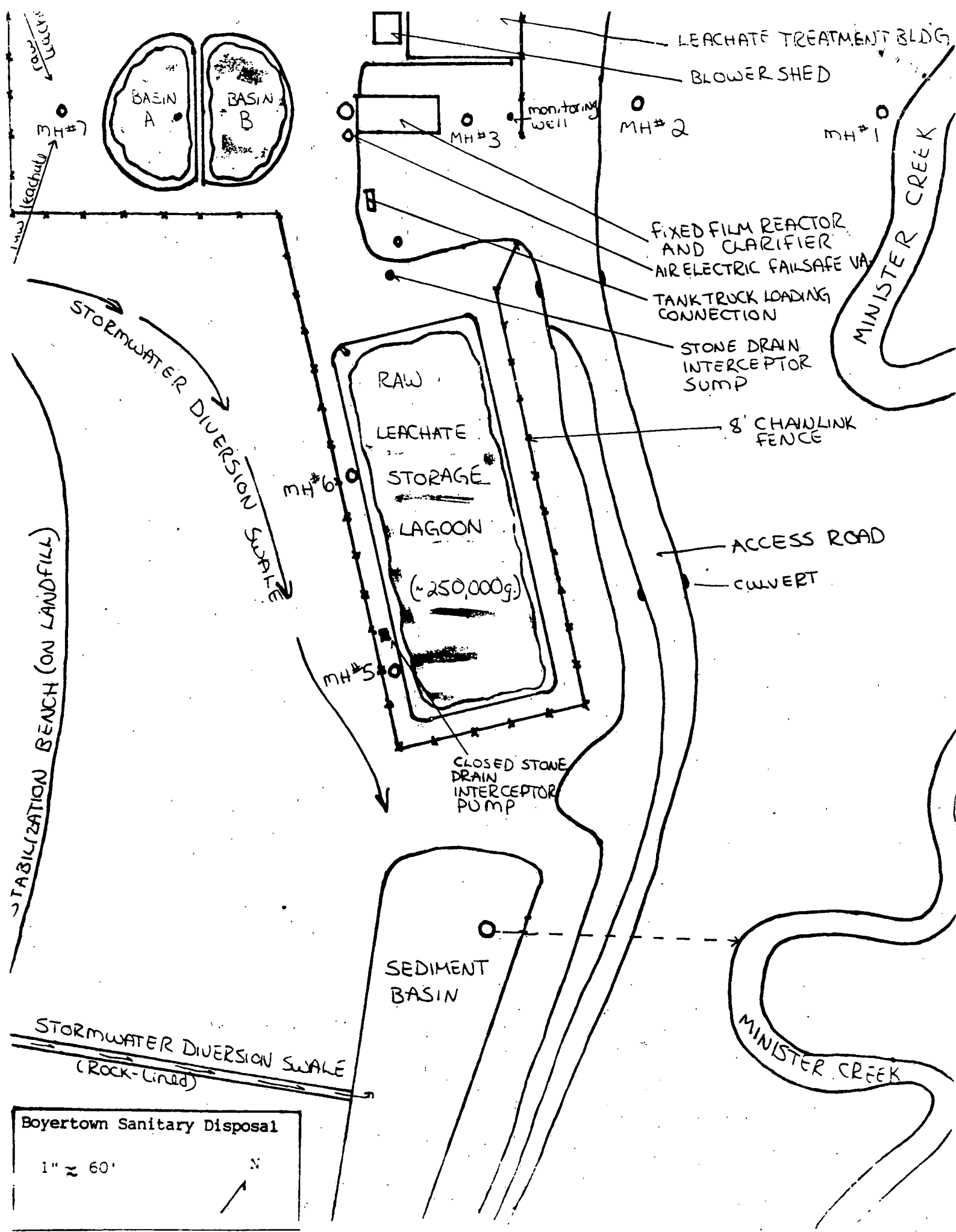
Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No



Boyertown Sanitary Disposal

1" ≈ 60'

N

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

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4/3, 4/13, 4/19, 4/20, 4/25, 4/26, 5/2, 5/4, 1995

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

12.) 25 Pa Code 265.310(c)(2) "Closure and postclosure maintenance and monitoring of groundwater monitoring system" Noncompliance observed 4/25 and 4/26, 1995.

It is recommended that Boyertown Sanitary Disposal start complying with all the closure requirements for the upkeep and maintenance of the Boyertown Landfill.

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Person interviewed (signature) Copy mailed to Warren Frame Date 7-7-95
Inspector (signature) Ken J. Zies Date 7-7-95

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Identification Number PAD 048603005

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- 5.) 25 Pa Code 265.91(d)(2) and 25 Pa Code 273.283(b)(6) "Monitoring wells locked" Noncompliance observed on 3/23/95 and on 4/13/95.

Note: this violation also noted, previously on 6/29/94.

- 6.) 25 Pa Code 265.226(1) "(Hazardous waste) surface impoundment freeboard level inspected once each operating day."

- 7.) 25 Pa Code 265.226(2) "(Hazardous waste) surface impoundment and surrounding structures inspected weekly"

- 8.) 25 Pa Code 265.73(a) "Written operating record maintained on premises."

- 9.) 25 Pa Code 273.311(a) "Daily records kept."

Non compliance observed 3/23 and 4/19, 1995. BSD personnel indicated that records have not been kept since 1994.

- 10.) 25 Pa Code 265.92(a) and 25 Pa Code 273.284 "Annual groundwater sampling"
Noncompliance observed on 4/25 and 4/26, 1995.

- 11.) 25 Pa Code 265.92(a) and 25 Pa Code 273.284 "Quarterly groundwater sampling"
Noncompliance observed on 4/25 and 4/26, 1995.

Note: the above groundwater violations also noted, previously on 6/29/94.

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Person interviewed (signature)

Cops mailed to Warren Frame

Date

7/7/95

Inspector (signature)

Charles J. Zick

Date

7/7/95

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conversation, basin 'A' was filled with treated leachate. This basin was scheduled to be sampled 5-11-95 by Wastex, Inc.

Violations summary

Listed below are all the violations of the Pennsylvania hazardous waste and municipal waste management regulations observed at the Boyertown Landfill, from the period 3/17 to 5/4, 1995.

- 1.) 25 Pa Code 265.222 "Hazardous waste surface impoundment maintained with a freeboard of two(2) feet." Noncompliance observed on all of the days visited.
- 2.) 25 Pa Code 265.310(c)(3) "Closure and postclosure leachate management requirements" Noncompliance observed on all of the days visited.
- 3.) 25 Pa Code 256.56 "Emergency procedures implemented" Noncompliance observed 3/17/95
- 4.) 25 Pa Code 270.1(a) and Act 97, Section 401(a) "No person or municipality may dispose of hazardous waste without a permit." Noncompliance observed on 3/17/95.

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Inspector (signature) Charles J. Zelle Date 7/7/95

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May 2, 1995 I visited the landfill to observe the leachate basins. The raw leachate basin appeared to have a minimum freeboard of 8 to 10 inches. Treated leachate basin 'A' appeared empty. Basin 'B' appeared full.

May 4, 1995 I visited the landfill to observe the leachate basins. The raw lagoon appeared to have a minimum freeboard of 10 to 12 inches. This was the most freeboard in this lagoon since the crisis began on 3-17-95. Basin 'A' appeared empty. Basin 'B' appeared to be about one-third empty.

My inspection on 5-4-95 concludes the visits of PA DER personnel to Boyertown Landfill that are documented on this inspection narrative.

The following information was gleaned from subsequent phone calls:

May 8, 1995, I spoke with Jim Brady (BMMA) -Jim Brady said that Wastex, Inc. re-sampled the treated leachate basins 'A' and 'B' on 4-24-95. The results were reported 4-26-95. The Cyanide (CN-) concentration was at an acceptable level and BMMA would permit BSD to discharge its leachate to the authority's treatment plant. Basin 'A' began to be discharged 4-26-95. By 5-3-95, basin 'A' was empty. On 5-4-95, basin 'B' started to be discharged.

May 10, 1995, from Charlie Fees (PA DER) to Byron Wenger (BSD) -Byron Wenger stated that, as of this

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Inspector (signature) Charlie J. Fees Date 7/7/95

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April 26, 1995 Tom Cunningham and PA DER solid waste specialist, Paul Handke, conducted groundwater sampling at the landfill.

Violations observed:

- 1.) 25 Pa Code 265.92(a) and
25 Pa Code 273.284 "Annual groundwater sampling"

Comment: BSD failed to conduct the annual compliance-monitoring-evaluation (CME) sampling of its monitoring wells. This necessitated the Department to conduct its own sampling of this facility, as evidenced by the sampling event conducted on 4/25-26/95.

- 2.) 25 Pa Code 265.92(a) and
25 Pa Code 273.284 "Quarterly groundwater sampling"

Comment: According to Departmental records, BSD has failed to conduct quarterly (every three months) sampling of its monitoring wells. BSD has not submitted any groundwater data since the second quarter of 1993.

- 3.) 25 Pa Code 265.310(c)(2) "Closure and Postclosure maintenance and monitoring of the groundwater monitoring system"

Comment: As stated, BSD has not fulfilled its closure requirements in this area since 1993.

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Person interviewed (signature)

Cops mailed to Warren from

Date

7/7/95

Inspector (signature)

Charles J. Zee

Date

7/7/95

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Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

3/24/95 Basin 'A' 0.08 mg/lit Cyanide Present from BSD was Byron Wenger
4/10/95 Basin 'A' 0.19 mg/lit Cyanide
4/10/95 Between the Carbon Towers 0.33 mg/lit Cyanide

J. Brady stated that leachate with these concentrations of Cyanide are unacceptable for treatment at the BMMA. The BMMA limit is 0.02 mg/lit. Therefore no leachate could be accepted based on these results.

During the afternoon, Tom Cunningham visited the landfill and pulled samples from the raw leachate lagoon as well as from Basins 'A' and 'B'.

April 25, 1995 PA DER waste management specialist, Maura Trimble, Tom Cunningham, and I visited the landfill and prepared for groundwater sampling. Present from BSD was Byron Wenger. It appeared, by visual observation, that the raw leachate lagoon had a freeboard of 6 to 8 inches. I stayed at the landfill for one hour, and then left to attend to other work related business. M. Trimble and T. Cunningham remained onsite. They performed a purging of the monitoring wells located on the landfill property.

It was learned, via a phone conversation with Byron Wenger, that BSD personnel had processed some raw leachate through the onsite pretreatment plant. This was done on Friday 4-21-95. The purpose, according to Mr. Wenger, was to increase the freeboard of the raw lagoon by lowering the leachate level. This provided extra capacity for the lagoon to accept a greater incoming leachate flow, in anticipation of a weekend storm.

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Person interviewed (signature) Copy mailed to Maura Trimble Date 7/7/95
Inspector (signature) Charles J. Lee Date 7/7/95

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Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

Dinesh Rakotjia	-engineer
Thomas Cunningham	-hydrologist
Charlie Fees	- solid waste specialist

Byron Wenger was present from BSD. The purpose of this visit was twofold:

1. D. Rakotjia and M. Aresary conducted a visual survey of the leachate and storm water basins.
2. T. Cunningham and C. Fees measured the freeboard of the raw leachate lagoon. Surveying equipment was used to measure the freeboard levels.

The raw leachate lagoon was observed to have a freeboard of 1 to 3 inches. This was less freeboard than was observed on 4-3-95. Byron Wenger stated that the latest Wastex, Inc. analyses showed that the cyanide levels in both Basin's 'A' and 'B' were too high to be accepted by the BMMA. As a result BSD personnel had pumped some leachate from Basin 'B' back to the raw lagoon. That is one reason why the raw leachate lagoon appeared nearly full (4-19-95) whereas the level was observed to be lower on 4-3-95. This disturbing turn of events precipitated the second major crisis of at this facility.

April 20, 1995 An internal meeting was held at about 10 am. Discussion centered around how to encourage BSD owner, Mr. Warren Frame, comply with Departmental regulations, by properly running the leachate system (as well as adhere to all the other post closure requirements) so as to eliminate the frequent crises situations occurring at this landfill.

Via a phone conversation with Jim Brady (from the BMMA) it was learned that Wastex, Inc., test samples from the two basins yielded the following results:

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Inspector (signature)	<u>Charles J. Lee</u>	Date	<u>7/7/95</u>

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Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

April 3, 1995 I visited the landfill to observe the lagoons. Basin 'B' appeared to be three-quarters empty. The raw lagoon had a freeboard of about 1 to 3 inches, by a visual observation.

April 13, 1995 I visited the landfill to observe the lagoons. Basin 'B' was full, that is, with the required two (2) feet of freeboard. Presumably, Basin 'B' was filled with leachate from the raw leachate lagoon. Leachate is pumped from the raw lagoon through the onsite 'pretreatment' plant, and then to either Basins 'A' or 'B'. The raw leachate lagoon itself had a minimum freeboard of 6 to 8 inches, by visual observation. This was not the two (2) feet required by the field compliance order of 3-22-95, but it was the most freeboard since the crisis began on 3-17-95.

Violations Observed:

- 1.) 25 Pa Code 265.91(d)(2) "Monitoring wells locked"

Comment: Monitoring Well no. nine (9) was reported to have no cap lock during the inspection of 3-23-95. On 4-13-95, this well was again observed to be lacking a lock. Pictures were taken of this well.

April 19, 1995 Boyertown Landfill was visited by four PA DER personnel:

Matthew Aresary -engineer

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Cops mailed to Warren Inmate

Date

7/7/95

Inspector (signature) _____

Chief 211

Date

7/7/95

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- 4.) 25 Pa Code 265.226(1) "Surface impoundment freeboard level inspected daily"
5.) 25 Pa Code 265.226(2) "Surface impoundment, including dikes and vegetation surrounding the dike inspected once each week.

Comment: BSD failed to maintain two feet of freeboard in the raw leachate lagoon, and failed to produce daily records to show that the landfill and impoundments are being maintained properly. Thus BSD is considered in noncompliance with its inspection requirements.

In addition to the above violations, one observation was made which is listed as being a "non-determined" compliance issue:

25 Pa Code 273.201(c)(2) "Gas plan implemented"

Comment: It was observed that the flare house, located at the southeast corner of the landfill was not being utilized. The door of this shack had been completely banged in, allowing easy entry by unauthorized personnel. At time of our visit the flare was not working.

March 24/25, 1995 BMMA, received the chemical analyses (from Wastex Lab) of treated leachate from Basin 'B'. After reviewing the data, the BMMA personnel decided that this leachate was suitable for discharge to the municipal treatment plant. The pump was turned on, and the draining of Basin 'B' was begun. Because of the slow flow rate, it would take nearly a week (7 days) to completely empty this basin.

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Inspector (signature) Charles J. Zee Date 7/7/95

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lagoon, in accordance with Section 265.222 of the Department's Hazardous Waste Management regulations.

March 23, 1995 Carol Sharp, Jay Maneval, and I visited BSD, for the purpose of measuring the freeboard around the raw leachate lagoon. The freeboard is the vertical distance between the waterline and the spot where the liner meets the surrounding grass and dirt. The freeboard measured by C. Sharp and J. Maneval ranged from 0 inches to 12 inches.

Violations observed:

- 1.) 25 Pa Code 265.91(d)(2) "Monitoring wells locked"

Comment: It was observed that well no. nine (9) had no lock. It appeared that the hasp had been ripped off. The cap of this well was easily removed by hand.

- 2.) 25 Pa Code 265.73(a)(b) "Operating record"
3.) 25 Pa Code 273.311(a) "Daily records kept"

Comment: Daily operational records were not available at time of inspection. Past records had been taken from the cabinet and thrown on the floor during an act of vandalism. Some of the papers were smeared with oil. BSD personnel indicated that daily records have not been kept since the vandalism that occurred during the Christmas holiday.

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March 19, 1995 Carol Sharp visited the landfill. No BSD personnel were observed to be present. She reported that the water level was below the top of the berm.

March 20, 1995 PA DER Water Quality Specialist Jay Maneval and I conducted water sampling at BSD. On this date the stream (minister creek), the storm water sedimentation pond, and the outfall from this pond were sampled.

March 21, 1995 Jay Maneval and I continued sampling at BSD. On this date, treated leachate lagoons, Basin A and Basin B, were sampled. The raw leachate lagoon was also sampled. I drove the samples to the PA DER laboratory in Harrisburg. The samples were received by chemist Dennis Neuin. The samples were analyzed for various inorganic constituents, including, but not limited to metals, cyanide, biological oxygen demand (bod), and pH. These parameters are covered under PA DER Bureau of Laboratories Code "210". Analyses specified under this code was chosen to satisfy the request from the BMMA that tests be performed on those parameters that are found in the Environmental Protection Agency's (EPA) Table 'A' analyte list.

March 22, 1995 Carol Sharp and Solid Waste Supervisor Robert France hand delivered a field compliance order to Mr. Warren Frame, the owner of Boyertown Landfill (BSD). This order required Mr. Frame to maintain a minimum freeboard level of two (2) feet in the raw leachate lagoon, in accordance with Section 265.222 of the Department's Hazardous Waste Management regulations.

attach and

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Inspector (signature) Charles J. Lee Date 7/7/95

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Comment: By allowing the raw leachate lagoon to overflow, BSD is in noncompliance with the these regulations. (The overflow situation was corrected on 3-18-95, but the required two(2) feet of freeboard was not attained in the period of time covered by this report.)

- 3.) 25 Pa Code 265.56 "Emergency procedures: notification of designated response facilities and the subsequent containment and cleanup of a fire, explosion, emission or discharge."

Comment: BSD personnel did not notify the Department of the discharge of leachate when the raw lagoon overflowed. Also BSD did not initiate any remedial action to contain the overflow. It was PA DER personnel who first reported and responded to this discharge.

- 4.) 25 Pa Code 270.1(a) and Act 97, Section 401(a) "No person or municipality may operate a hazardous waste disposal facility without first obtaining a permit from the Department."

Comment: BSD was in violation of the above regulation/statute when it allowed its hazardous waste leachate impoundment to overflow.

March 18, 1995 In Carol Sharp's inspection report of 3/18/95 she states that she observed Mr. Frame pumping raw leachate from the lagoon into a tanker truck.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to Warren Frame Date 7/7/95
Inspector (signature) Charlie J. Lee Date 7/7/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Dates of inspection 3/17, 3/18, 3/19, 3/20, 3/21, 3/22, 3/23, 3/24, 3/5 Identification Number PAD 048603005
4/3, 4/13, 4/19, 4/20, 4/25, 4/26, 5/2, 5/4, 1995

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

The following is a summary of visits to Boyertown Landfill from March to May, 1995.
At the end of this report are listed the violations of the Pennsylvania Hazardous Waste and Residual waste management regulations.

March 17, 1995 Relevant to the inspection report of 3/17/95, PA DER Compliance Specialist Carol Sharp first observed that BSD's raw leachate lagoon was overflowing. No BSD personnel were onsite. Back in the office later the same day, the Department held an emergency meeting on how to resolve this situation. The owner of BSD, Mr. Warren Frame, could not immediately be reached by phone. The Berks-Montgomery Municipal Authority (BMMA) was contacted. BMMA operator Jim Brady stated that he could not accept treated leachate until BSD conducted a chemical analysis of the treated leachate and submitted them to BMMA. In particular, the BMMA was concerned with the concentration of cyanide(CN-).

At about 6:15 PM Mr. Frame was contacted by phone and informed that the BSD raw leachate lagoon was overflowing. He agreed to bring liquid tanker trucks onsite to temporarily store some of the leachate in an attempt to stop the overflow.

Violations Observed

- 1.) 25 Pa Code 265.222 "Hazardous Waste surface impoundments shall be maintained to prevent overflowing and the impoundment shall have a minimum freeboard of two (2) feet".
- 2.) 25 Pa Code 265.310(c)(3) "Closure and Postclosure maintenance & monitoring of the leachate collection, removal, and treatment system."

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to Warren Frame Date 7/7/95
Inspector (signature) Charles J. Zee Date 7/7/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - SURFACE IMPOUNDMENTS

Site Name BOYERTOWN ID Number PAD 048603005 Date _____

LAND FILL

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
			X	Surface impoundment managed to maintain at least 60 cm (2ft.) of freeboard	265.222	H366
X				Protective cover on earthen dikes, such as suitable vegetation, rock rip-rap or non-erodible material to minimize wind and water erosion	265.223	H367
X				Waste analysis and/or trial tests conducted when hazardous wastes substantially different from wastes previously treated or stored, or when hazardous waste is chemically treated with a substantially different process than any previously used in that impoundment	265.225(a)	H368
			X	Freeboard level inspected once each operating day	265.226(1)	H369
			X	Surface impoundment, including dikes and vegetation surrounding the dike, inspected once each week	265.226(2)	H370
X				Placement of ignitable or reactive waste only with Department's approval	265.229	H371
X				Precautions taken for handling ignitable, reactive or incompatible material	265.230	H372
		X		Closure and post-closure requirements complied with	265.228(a-c)	H373

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
			X	Approved groundwater sampling and analysis plan developed and implemented	265.92(a)
			X	Adequate protection for groundwater monitoring wells	265.92(d)
		X		Groundwater quality assessment and abatement outline on the premises	265.93(a)
		X		Closure plan on the premises and up-to-date	265.112(a)
		X		Post-closure plan on the premises and up-to-date	265.118(a)
		X		Annual closure cost estimate on the premises and up-to-date	265.142(a)
		X		Annual post-closure cost estimate on the premises and up-to-date	265.144(a)

X CLOSURE & POST CLOSURE LEACHATE
MANAGEMENT REQUIREMENTS 265.310(c)(3)

X CLOSURE & POST CLOSURE GROUNDWATER
MONITORING REQUIREMENTS. 265.310(c)(2)

Hazardous Waste Inspection Report

TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
		X		Facility equipped with fire control, spill control, and decontamination equipment	265.32(3)
				Facility equipped with water at adequate volume and pressure to supply fire control equipment	265.32(4)
				Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained	265.33
		V		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	265.35
			X	Contingency plan onsite and implemented <i>ALSO 265.56</i>	265.51(a)
				Contingency plan describes action taken by personnel in the event of an emergency	265.52(a)
				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	265.52(c)
				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	265.52(d)
				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	265.52(e)
				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	265.52(f)
				Emergency coordinator designated and on the premises or on call	265.55
				Facility accepting only PA manifests	265.71(a)
				Manifest properly completed and routed within time limits	265.71(b)(c)
		V		Manifest discrepancies resolved or reported within time limits	265.72(b)
			X	Written operating record maintained on the premises	265.73(a)
		X		Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	265.73(b)(1)
				Written operating record contains location and quantity of each hazardous waste	265.73(b)(2)
				Written operating record contains results of waste analyses and treatability tests	265.73(b)(3)
				Written operating record contains reports and details of all incidents	265.73(b)(4)
				Written operating record contains records and results of all inspections	265.73(b)(5)
				Written operating record contains required monitoring, testing, and analytical data	265.73(b)(6)
				Written operating record contains closure and post-closure cost estimates	265.73(b)(7)
				All records retained on premises and available for inspection	265.74(a)
		V		Quarterly reports submitted to DER	265.75(a)
			X	Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)
		X		Groundwater monitoring wells located at approved sites	265.90(b)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name BOYERTOWN LHDFL ID Number PAD 048603005 Date _____

Hazardous Waste Inspection Report
TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
		X		Part A permit application submitted	265.1(b) 265.431(a)
				Identification number	265.11
				Wastes accepted at facility transported by haulers licensed by DER to transport hazardous waste	265.11(a)
				Waste streams not covered by permit approved by DER before acceptance	265.13(a)
				Chemical and physical analysis repeated as required	265.13(a)(1-3)
				All waste shipments inspected and analyzed when necessary	265.13(b)
				Waste analysis plan on-site	265.13(c)
				24 hr. surveillance at active portion	265.14(b)(1)
				Artificial barrier around active portion	265.14(b)(2)
				Proper signs posted at each entrance, minimum 4 inch lettering	265.14(c)
				Facility inspection schedule on-site	265.15(b)(1)
				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	265.15(d)
				Immediate remedial action taken where a hazard is imminent or has already occurred	265.15(d)
				Approved on the job or classroom personnel training program implemented	265.16
				Records retained for each employee at facility of training, job title, and job description	265.16(f);(g)
				Ignitable or reactive wastes separated from source of ignition or reaction	265.17(a)
				No smoking signs displayed where there are hazards from ignitable or reactive wastes	265.17(a)
				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265.17(b)
				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents	265.31
				Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	265.32(1)
		✓		Device for summoning outside emergency assistance available at scene of operations	265.32(2)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT

TSD FACILITIES - PART A

3/17, 3/18, 3/19, 3/20
3/21, 3/22, 3/23, 3/24, 3/25, 4/3, 4/13, 4/19, 4/20, 4/25, 4/26
Date of Inspection 5/2, 5/4, 1995 Time start _____ Time finish _____
Name of Inspector CHARLIE FEES
Company, installation name BOYERTOWN LANDFILL
Location 300 MERKEL RD. ALBERTSVILLE, PA. 19525
County MONTGOMERY Municipality DOUGLASS TWP.
Identification number EPA ID PAD048603005
Name of responsible official WARREN FRAME
Title OWNER / PRESIDENT
Mailing Address 1205 POTTSTOWN PIKE, GLENMOORE, PA. 19343
Area code and telephone number (610) 450-5300
Name of person interviewed BYRON WENCER
Title ASSISTANT
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site characterization:

- a. ☒ Treatment - ☐ surface impoundments ☐ chemical ☒ physical ☒ biological
b. ☒ Storage - ☐ containers ☐ tanks ☒ surface impoundments ☐ waste piles
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F039 MULTI-SOURCE LEACHATE

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 9 September 2004Identification Number PAD048603005Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Thursday September 9, 2004 by Gerry Radomski, Waste Management Specialist, and Dennis Harney, Compliance Specialist with the Department. Mr. Warren Frame, Preseident of BSD, was present during the inspection.

The following observations were noted:

- 1) Both of the treated leachate lagoons and the raw leachate lagoon had the 2 feet of required freeboard. The liners of these lagoons determined to be leaking by BSD have not been repaired.
- 2) Neither the main flare, the temporary candle flares nor the newly installed flare system were operating during the inspection. There was a moderate landfill gas odor noted in the area of the leachate treatment plant.
- 3) The new gas destruction system has been test run.
- 4) BSD has not submitted to the Department quarterly groundwater monitoring results since the first quarter of 2003.

The following violations were noted:

- 1) Failure to report to the Department the quarterly groundwater monitoring results for the second quarter of 2003 through the second quarter of 2004 for the parameters listed in 40 CFR§ 264.98. This is contrary to 25 Pa Code § 264a.97(2)(ii).
- 2) By failing to repair the leachate lagoon liners and by failing to collect and flare gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR §§ 265.111.

In summary, two violations were noted during the inspection. The results of the inspection were reviewed with Mr. Frame during the inspection. A copy of this report was retained by the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Warren K. Frame Pres

Date

9/9/04

Inspector (signature)

Dennis Harney

Date

9/9/04

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name BSOC ID Number PA0048603005 Date 9/9/04

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Run-on diverted away from the facility	265.302(a)(1)	H425
X				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
X				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
		X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	X			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435



Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
	X			Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
	X			Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
	X			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
	X			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
	X			Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
	X			Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		X		Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
	X			Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
	X			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
	X			Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
	X			Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
	X			Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
	X			Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
	X			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

Part B

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name BSDC ID Number PA0048603005 Date 9/9/04

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
	X			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
	X			Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection 9/9/04 Time start _____ Time finish _____
 Name of Inspector GERRY RADOMSKI
 Company, installation name BOYERTOWN SANITARY DISPOSAL CO (BSOC)
 Location 300 MERKEL RD
 County MONTGOMERY Municipality DOUGLASS TWP
 Identification number PA0048603005
 Name of responsible official WARREN FRAME
 Title PRESIDENT
 Mailing Address 1205 POTTS TOWN PIKE GLENMORE, PA 19342
 Area code and telephone number 610-321-1226
 Name of person interviewed WARREN FRAME
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☒ Disposal

Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection August 2, 2005

Identification Number PAD000429589

Company/Facility/Site GROWS Landfill

ensure that it obtains the signed return manifest for its shipment of hazardous waste within 30 days of shipment. The signed copies were at the WWTP and were not viewed during the inspection.

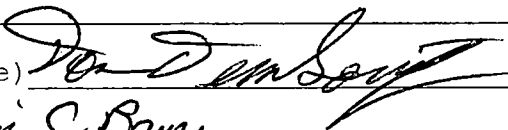
7. The daily, weekly, and monthly inspection reports and operational logs for the treatment plant, roll-offs, tanks, pad, safety equipment, etc. as well as the PPC Plan were reviewed.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

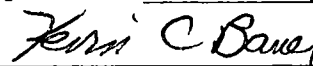
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) 

Date

8-2-05

Inspector (signature) 

Date

8/2/05

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection August 2, 2005Identification Number PAD000429589Company/Facility/Site GROWS Landfill

A routine inspection of the hazardous waste activities occurring at GROWS Landfill located in Falls Township, Bucks County was conducted on August 2, 2005, by Mr. Kevin Bauer of the Department. Mr. Don Demkovitz and Mr. Doug Wood were present for the facility. The following observations were noted:

1. GROWS Landfill is a large quantity generator of hazardous waste, operates a wastewater treatment plant (WWTP) under PBR for the treatment of F039 leachate, and is operating under a RCRA post-closure permit for the old GROWS Landfill. The facility has a USEPA identification number of PAD000429589.
2. The old GROWS Landfill has a sprayed asphalt liner. Leachate from the old GROWS Landfill is gravity drained to the WWTP. The leachate (F039), segregated from other leachate generated at the landfill, enters a collection sump. On average, 4300 to 4800 gallons of leachate from the old GROWS is generated daily. Grit is periodically removed from the sump and placed into a grit-dewatering chamber. Leachate drained from this process is piped into the plant. The grit-dewatering chamber was properly labeled, dated, and covered with a tarp. The tarp on one end of the chamber is opened during sunny days to help dry the material. Within 90 days from placement of the grit into the chamber, the grit is loaded into a roll-off and disposed as a hazardous waste (F039) at Model City, NY.
3. The hazardous leachate combined with leachate from the landfill is then treated in the plant. Operations at the plant and the treatment process were reviewed and explained. The plant is limited to a 100,000 gpd average discharge and is now treating about 80,000 to 87,000 gpd of leachate. Filter cake from the treatment process is placed into a roll-off, labeled as hazardous waste, and placed onto a containment pad. Every 28 days, the filter cake is sampled. If the samples meet the delisting criteria, the filter cake is handled as a residual waste and disposed at GROWS. If the sample results are not back within 90 days or if it fails the delisting criteria, the material is handled as a hazardous waste and disposed at Model City. It has been at least 10 - 12 years since this has happened.
4. Waste Management should remove weeds from and make repairs as needed to the roll-off containment pad.
5. Waste Management should look into recoating the ammonia stripping towers and the effluent storage tank. Rust is forming on these tanks.
6. The facility utilizes three Safety Kleen parts washers (petroleum naphtha) at the WWTP and the truck maintenance facility. Manifests for the disposal of the naphtha and the grit were reviewed. Waste Management should

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Don DemkovitzDate 8-2-05Inspector (signature) Kevin C BauerDate 8/2/05

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X				Closure plan on the premises and up-to-date	265a.1	265.112	H250
X				Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
X				Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
X				Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X				Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
X				Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
X				Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
X				Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
X				Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
X				Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
X				Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
X				Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
X				Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
X				Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
X				Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
X				Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
X				All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
X				Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
X				Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
X				Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
X				Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
X				Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
X				No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
X				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
X				Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
X				Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
X				Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
X				Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
X				Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
X				Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
X				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
X				Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
X				Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
X				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
X				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
X				Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
X				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name GROWS Landfill ID Number PAD000429589 Date 8/2/2005

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
X				Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
X				Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
X				Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
X				All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
X				Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
X				24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
X				Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
X				Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
X				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
X				Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
X				Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
X				Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection August 2, 2005 Time start 11:00 Time finish _____
Name of Inspector Kevin Bauer
Company, installation name GROWS Landfill
Location 1000 New Ford Mill Road Morrisville, PA 19067
County Bucks Municipality Falls Township
Identification number PAD000429589
Name of responsible official Don Demkovitz
Title Manager of Environmental Protection
Mailing Address 1121 Bordentown Rd Morrisville, PA 19067
Area code and telephone number 215-428-4377
Name of person interviewed Don Demkovitz, Doug Wood – Treatment Plant Operator
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☒ Treatment – ☒ Storage– ☒ Disposal –
PBR WWTP roll-offs post-closure

Check all that apply:

- | | | |
|--|--|--|
| <input type="checkbox"/> surface impoundments | <input checked="" type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input checked="" type="checkbox"/> chemical treatment | <input checked="" type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input checked="" type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:
F039, D001, D018, D039

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name GROWS Landfill ID Number PAD000429589 Date 8/2/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
LQG TANKS (Subchapter J)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled to accurately identify contents	265a.194		H044
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections completed and documented in operating log	265a.195	265.195	H045
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special small quantity generator requirements	265a.1	265.201	H048
SQG TANKS							
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste removed at closure	265a.1	265.201(d)	H056
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name GROWS Landfill ID Number PAD000429589 Date 8/2/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name GROWS Landfill ID Number PAD000429589 Date 8/2/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 8/2/2005Time Start 11:00

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT☒ **GENERATOR**☐ **S Q GENERATOR**

HWOen - 1469968

HW PBR - 1469969

HW TSD disposal - 1469970

Company name GROWS Landfill I.D. Number PAD000429589Site Address 1000 New Ford Mill Road Morrisville, PA 19067County Bucks Municipality Falls Township Zip 19067Name of Inspector Kevin BauerName & Title of Responsible Official Don Demkovitz - Manager of Environmental ProtectionPerson Interviewed Don Demkovitz, Doug Wood Telephone (215) 428-4377Mailing Address (if different from above) 1121 Bordentown Rd. Morrisville, PA 19067Amount of Hazardous Waste Generated per Month: >2200 Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Horwith Trucks License Number PA-AH0176Transporter Name Safety Kleen License Number PA-AH0172

Transporter Name _____ License Number _____

4. Types of hazardous waste treatment, storage, and disposal facility (location & type).

Waste Code	Waste Description	Destination Facility
F039	oil - grit	CWM Chem Services
		Model City, NY
D001, 19, 39	petroleum naphtha	Safety Kleen FairlessHills
F039	leachate from old GROWS Landfill	treated on-site

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 05/17/2005Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")

Sampling Event

On this day the weather was partly sunny and pleasant, approx. 75° F.

The sampling event began at approximately 8am, and lasted until approx. 1:30pm.

The following wells were sampled:

SMW-1, AMW-1, MW-5, MW-6, Mw-7, MW-8, MW-9, MW-10, MW-11, and MW-12.

The sample bottles were labeled and given the proper fixatives prior to sampling. The following parameters were sampled:

- | | |
|-------------------------------------|---------------------|
| a) Volatile organic compounds (VOC) | e) Phenols |
| b) Total organic halides (TOX) | f) Ammonia |
| c) Inorganics | g) Total Metals |
| d) Total organic carbon (TOC) | h) Dissolved Metals |

After sampling, each group of bottles were given a legal seal, and packed with ice in a cooler.

After returning to the DEP building, in Norristown PA, the bottles were shipped to the PA DEP labs, located in Harrisburg, PA.

The sampling event was conducted on Tuesday (5-17-05), and Thursday (5-19-2005)

Conclusion

It is recommended that BSD perform all future groundwater sampling events in order to return to compliance with 40 CFR 264.99(a).

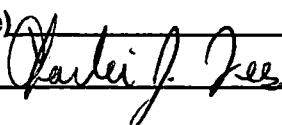
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Person interviewed (signature) _____

Inspector (signature) _____



Date _____

Date 5/17/2005Page of 7

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 05/17/2005Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")**Introduction**

On this date, The Department of Environmental Protection performed a groundwater-sampling event. The Department performed this split sampling event along with "Tetra Tech, Inc." who are the consultants contracted by The Department to perform this sampling event.

Background

Boyertown Landfill is a closed landfill that has been determined to be hazardous because it had in the past accepted hazardous wastes from industry. Groundwater sampling is routinely performed at this facility to detect any signs of groundwater contamination should it occur.

Because of its hazardous designation, the Department requires BSD to conduct annual compliance-monitoring-evaluation (CME) sampling at this landfill. The owner of this landfill, Warren Frame, has failed to perform this annual sampling of the wells at this landfill. This is contrary to

40 CFR 264.99(a) "Owner or operator must monitor the groundwater..."

Because Mr. Frame failed to conduct this required sampling, the Department contracted Tetra-Tech, inc. to assist with the CME sampling of this landfill

At today's sampling event the following personnel were present:

Boyertown Landfill**PA DEP****Tetra Tech**

Warren Frame

Jennifer Wilson
Andrew Haneiko
Charlie FeesTodd Riger
Derrick Pinkham

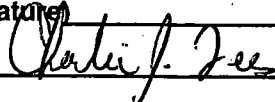
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Person interviewed (signature) _____

Inspector (signature) _____



Date _____

Date 5/17/2005Page 6 of 7

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
				Annual closure cost estimate on the premises and up-to-date	264a.1	265.142	H252
		X			265a.1	264.142	
				Annual post-closure cost estimate on the premises and up-to-date	264a.1	264.144	H253
		X			265a.1	265.144	

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
		X		Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
		X		Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
	X			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
	X			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
	X			Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		X		Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
X				Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
X				Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
X				Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
		X		Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
X				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B**

Site Name Boxertown Landfill ID Number PAD 048603005 Date May 17 '2005

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste.	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
		X		Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
		X		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

EPA

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection May 17 '2005 Time start _____ Time finish _____
Name of Inspector Charles Feer, Andrew Haneiko, Jennifer Wilson
Company, installation name Boxertown Landfill
Location 300 Menkel Rd, Gilbertsville, PA 19525
County Montgomery Municipality Douglas Twp.
Identification number PAD 048603005
Name of responsible official Warren Frame
Title Owner
Mailing Address _____
Area code and telephone number _____
Name of person interviewed _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☐ Disposal

Check all that apply:

- | | | |
|--|-------------------------------------|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | | |

2. Does the facility generate hazardous waste? ☒ No

3. Types of hazardous waste produced by facility: _____ Site Number: _____

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No



U.S. Environmental Protection Agency

Resource Conservation and Recovery Act (RCRAInfo)

Recent Additions | Contact Us | Print Version EF Search: **GO**

EPA Home > Envirofacts > RCRAInfo > Query Results



RCRAInfo

Query Results

Report
an
Error

Consolidated facility information (from multiple EPA systems) was searched to select facilities

Handler ID: Beginning With: pad048603005

Results are based on data extracted on JUL-10-2005

Note: Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility.

Go To Bottom Of The Page

HANDLER NAME: BOYERTOWN SANITARY DISPOS HANDLER ID: PAD048603005 2/3/01
 STREET: 300 MERKEL RD FACILITY INFORMATION: View Facility Information
 CITY: GILBERTSVILLE CORPORATE LINK: No
 STATE: PA COUNTY: MONTGOMERY
 ZIP CODE: 19525 MAPPING INFO: MAP
 EPA REGION: 3

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
MICHAEL MILLER	300 MERKEL RD	GILBERTSVILLE	PA	19525	2153677524	Public

HANDLER / FACILITY CLASSIFICATION

HANDLER TYPE	LAND DISPOSAL	INCINERATOR	BOILER AND OR INDUSTRIAL FURNACE	STORAGE	TREATMENT
Full Enforcement	Y				Y
Permit Progress	Y				Y
Permit Workload					Y
Post-Closure Workload	Y				

HANDLER TYPE
TSDFs Potentially Subject to Corrective Action Under Section 3004 (u)/(v)
Subject to CA
CA Workload

Transporter

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 05/17/2005Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")

Sampling Event

On this day the weather was partly sunny and pleasant, approx. 75° F.

The sampling event began at approximately 8am, and lasted until approx. 1:30pm.

The following wells were sampled:

SMW-1, AMW-1, MW-5, MW-6, Mw-7, MW-8, MW-9, MW-10, MW-11, and MW-12.

The sample bottles were labeled and given the proper fixatives prior to sampling. The following parameters were sampled:

- | | |
|-------------------------------------|---------------------|
| a) Volatile organic compounds (VOC) | e) Phenols |
| b) Total organic halides (TOX) | f) Ammonia |
| c) Inorganics | g) Total Metals |
| d) Total organic carbon (TOC) | h) Dissolved Metals |

After sampling, each group of bottles were given a legal seal, and packed with ice in a cooler.

After returning to the DEP building, in Norristown PA, the bottles were shipped to the PA DEP labs, located in Harrisburg, PA.

The sampling event was conducted on Tuesday (5-17-05), and Thursday (5-19-2005)

Conclusion

It is recommended that BSD perform all future groundwater sampling events in order to return to compliance with 40 CFR 264.99(a).

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Person interviewed (signature) *Marked* 7-25-05

Date

Inspector (signature) *Charles J. Lee*

Date

5/17/2005Page of 7

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 05/17/2005Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")

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On this date, The Department of Environmental Protection performed a groundwater-sampling event. The Department performed this split sampling event along with "Tetra Tech, Inc." who are the consultants contracted by The Department to perform this sampling event.

Background

Boyertown Landfill is a closed landfill that has been determined to be hazardous because it had in the past accepted hazardous wastes from industry. Groundwater sampling is routinely performed at this facility to detect any signs of groundwater contamination should it occur.

Because of its hazardous designation, the Department requires BSD to conduct annual compliance-monitoring-evaluation (CME) sampling at this landfill. The owner of this landfill, Warren Frame, has failed to perform this annual sampling of the wells at this landfill. This is contrary to

40 CFR 264.99(a) "Owner or operator must monitor the groundwater..."

Because Mr. Frame failed to conduct this required sampling, the Department contracted Tetra-Tech, inc. to assist with the CME sampling of this landfill

At today's sampling event the following personnel were present:

Boyertown Landfill

PA DEP

Tetra Tech

Warren Frame

Jennifer Wilson
Andrew Haneiko
Charlie FeesTodd Riger
Derrick Pinkham

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Date _____

Inspector (signature) _____

Date 5/17/2005Page 6 of 7

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
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		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
				Annual closure cost estimate on the premises and up-to-date	264a.1	265.142	H252
		X			265a.1	264.142	
				Annual post-closure cost estimate on the premises and up-to-date	264a.1	264.144	H253
		X			265a.1	265.144	

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

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	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
		X		Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
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	X			Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

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		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B**

Site Name Boxertown Landfill ID Number PAD 048603005 Date May 17 '2005

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste.	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
		X		Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
		X		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215

Field



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection May 17 '2005 Time start _____ Time finish _____
Name of Inspector Charles Feer, Andrew Hanelko
Company, installation name Boxentown Landfill
Location 300 Menkel Rd, Gilbertsville, PA 19525
County Montgomery Municipality Douglers Twp.
Identification number PAD 048603005
Name of responsible official Warren Frame
Title Owner
Mailing Address 1205 Pottstown Pike, Glenmora PA 19343
Area code and telephone number (610) 321-1236
Name of person interviewed _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☐ Disposal

Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 9 September 2004Identification Number PAD048603005Company/Facility/Site Name Boyetown Sanitary Disposal (BSD)

A hazardous waste TSD inspection was conducted on Thursday September 9, 2004 by Gerry Radomski, Waste Management Specialist, and Dennis Harney, Compliance Specialist with the Department. Mr. Warren Frame, Preseident of BSD, was present during the inspection.

The following observations were noted:

- 1) Both of the treated leachate lagoons and the raw leachate lagoon had the 2 feet of required freeboard. The liners of these lagoons determined to be leaking by BSD have not been repaired.
- 2) Neither the main flare, the temporary candle flares nor the newly installed flare system were operating during the inspection. There was a moderate landfill gas odor noted in the area of the leachate treatment plant.
- 3) The new gas destruction system has been test run.
- 4) BSD has not submitted to the Department quarterly groundwater monitoring results since the first quarter of 2003.

The following violations were noted:

- 1) Failure to report to the Department the quarterly groundwater monitoring results for the second quarter of 2003 through the second quarter of 2004 for the parameters listed in 40 CFR§ 264.98. This is contrary to 25 Pa Code § 264a.97(2)(ii).
- 2) By failing to repair the leachate lagoon liners and by failing to collect and flare gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR §§ 265.111.

In summary, two violations were noted during the inspection. The results of the inspection were reviewed with Mr. Frame during the inspection. A copy of this report was retained by the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Warren X. Frame PresDate 9/9/04Inspector (signature) Dennis HarneyDate 9/9/04

Page ____ of ____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name BSOC ID Number PA0048603005 Date 9/9/04

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Run-on diverted away from the facility	265.302(a)(1)	H425
X				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
X				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
		X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	X			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435



Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
	X			Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
	X			Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
	X			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
	X			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
	X			Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
	X			Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		X		Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
	X			Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
	X			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
	X			Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
	X			Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
	X			Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
	X			Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
	X			Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name B50C ID Number PA0048603005 Date 9/9/04

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
	X			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
	X			Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection 9/9/04 Time start _____ Time finish _____
 Name of Inspector GERRY RADOMSKI
 Company, installation name BOYERTOWN SANITARY DISPOSAL CO (BSOC)
 Location 300 MERKEL RD
 County MONTGOMERY Municipality DOUGLASS TWP
 Identification number PA0048603005
 Name of responsible official WARREN FRAME
 Title PRESIDENT
 Mailing Address 1205 POTTS TOWN PIKE GLENMORE, PA 19342
 Area code and telephone number 610-321-1236
 Name of person interviewed WARREN FRAME
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☒ Disposal

Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name B50C ID Number PA0048603005 Date 9/16/03

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBER
1	2	3	4			
X				Run-on diverted away from the facility	265.302(a)(1)	H425
X				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
X				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
		X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	X			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435



Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
	X			Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
	X			Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
	X			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
	X			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
		X		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
			X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
X				Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
X				Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
		X		Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
		X		Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name B50C ID Number PA0048603005 Date 8/16/03

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1	2	3	4				
				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
	X			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
		X		Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
		X		Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection 9/16/03 Time start _____ Time finish _____
Name of Inspector GERRY RADOMSKI
Company, installation name BOYERTOWN SANITARY DISPOSAL CO. BSOC
Location 300 MERKEL ROAD
County MONTGOMERY Municipality DOUGLASS TWP
Identification number PAD048603005
Name of responsible official WARREN FRAME
Title PRESIDENT
Mailing Address 1205 POTTSTOWN PIKE GLENMORE, PA 19343
Area code and telephone number _____
Name of person interviewed _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☐ Treatment ☐ Storage ☐ Disposal

Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 07/21/2006Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")ADDENDUM

Warren Frame provided a brief outline of the treatment steps for the leachate generated by the landfill:

- a) Leachate enters the large raw leachate surface impoundment.
- b) Leachate is pumped up to the "air house". This is a small treatment basin (covered by a roof) in which air is continuously bubbled through the leachate water. This step gives biological treatment to the leachate. At the clarifier end of this air house, Warren Frame says he adds a bio-energizing chemical that prevents sludge precipitation.
- c) The leachate is then pumped into a 250-gallon square, plastic tank, inside the maintenance building.
- d) From this tank, the leachate is pumped up thru a "stripping tower", in order to remove volatile compounds.
- e) Then the leachate is pumped back into the building, into another 250-gallon square plastic tank.
- f) The leachate is then pumped thru large blue-colored carbon tanks.
- g) Finally the leachate water is pumped into either of two (2) small treated leachate surface impoundments

Warren Frame said that effluent from the bathroom and the washing machine occasionally is added to the treatment process at the air house stage.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Charles J. Fees *mailed*Date 8-25-06Inspector (signature) Charles J. FeesDate 7-21-06Page 8 of 8

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 07/21/2006Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")The following violations were noted:

- 1) 40 CFR 265.111(b) "Operator prevents leachate from leaking into the ground"
- 2) 40 CFR 265.92(a) "Groundwater sampling plan developed and implemented"
- 3) 40 CFR 264.99(a) "Groundwater monitoring performed"
- 4) 40 CFR 264.73(a),(b) "Written operating record..."

It is recommended that Boyertown Sanitary Disposal Company correct the violations listed above.

I reviewed the results of this inspection with Warren Frame prior to my departure.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

mailed

Date

8-25-2006

Inspector (signature) _____

Charles J. Fee

Date

7-21-06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 07/21/2006Identification Number: PAD 048603005Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")

On this date Charlie Fees of the PA DEP conducted a hazardous waste, treatment, storage, and disposal (TSD) facility inspection. Warren Frame granted access.

The following observations were made:

1. The EPA assigned an identification number to this landfill after it reportedly accepted hazardous waste prior to its closing.
2. At time of inspection the freeboard of the raw leachate impoundment appeared to be 2 feet, while the free board of the treated impoundments appeared to be approx. 1½ feet.

Warren Frame said that the impoundment liners have not been repaired. The impoundments were determined to be leaking by BSD.

3. BSD has not submitted to the Department quarterly groundwater monitoring results since the 1st quarter of 2003. (The Department conducted a sampling event on May 17, 2005.)
4. At time of inspection, none of the flares were working. Warren Frame said that the newly installed flare system does not work because the landfill does not generate enough gas to support combustion.

I did not detect any landfill gas odors during today's inspection.

5. Warren Frame said the two treated leachate surface impoundments have a combined total of 135,837 gallons.
6. BSD does not have a complete record of the quantities and time when leachate is discharged to the local sewage treatment plant. Also, chemical analyses were not available at time of inspection. (Warren Frame appears to have a partial record of leachate discharges on file at the landfill maintenance building)

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date

8-25-06

Inspector (signature) _____

Date

7-21-06Page 6 of 8

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
		X		Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
		X		Written operating record contains results of waste analyses and treatability tests <i>See "Comments" # 6</i>	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
		X		Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
		X		Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
		X		Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
		X		Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
		X		All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
		X		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
			X	Approved groundwater sampling and analysis plan developed and implemented <i>See "Comments" # 3</i>	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
	X			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
	X			Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
	X			Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART B**

Site Name BSDC ID Number PAD 040603005 Date July 21 2006

**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
		X		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



eFACTS 1559071

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Company, installation name Boyertown Sanitary Disposal Co. (BSDC)
Name of Inspector Charles Fees
Location 300 Merkel Rd., Albentville, PA 19525
County Montgomery Municipality Douglass Twp.
EPA I.D. Number PAD 040603005 Employer I.D. Number (EIN) _____
Name of responsible official Warren Frame
Title President
Mailing Address 1205 Pottstown Pike Glenmoore, PA 19343
Area code and telephone number 610 321-1236
Name of person interviewed Warren Frame
Mailing address (if different from above) _____
Area code and telephone number _____

1. Site Characterization: ☒ Treatment ☐ Storage ☒ Disposal

Check all that apply:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input checked="" type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F039 Multisource Leachate

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

EPA ID Number PAD 048603005			Handler Name Boyetown Sanitary Disposal Co., Inc.		
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input checked="" type="checkbox"/>
Seq. No <div style="border: 1px solid black; width: 40px; height: 20px; margin: 5px;"></div>	Violation Type 264.E	Agency S	Determined Date (mm/dd/yyyy) 7/21/2006	Return to Compliance (RTC) Qualifier <div style="border: 1px solid black; width: 40px; height: 20px; margin: 5px;"></div> <small>A RTC Qualifier is required if entering an Actual RTC Date.</small>	Actual RTC Date (mm/dd/yyyy) <div style="border: 1px solid black; width: 100px; height: 20px; margin: 5px;"></div>
Notes: Incomplete operating record					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
F.R.	40 CFR 264.73(a)				
FR	264.73(b)				
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input checked="" type="checkbox"/>
Seq. No <div style="border: 1px solid black; width: 40px; height: 20px; margin: 5px;"></div>	Violation Type 265.F	Agency S	Determined Date (mm/dd/yyyy) 7/21/06	Return to Compliance (RTC) Qualifier <div style="border: 1px solid black; width: 40px; height: 20px; margin: 5px;"></div> <small>A RTC Qualifier is required if entering an Actual RTC Date.</small>	Actual RTC Date (mm/dd/yyyy) <div style="border: 1px solid black; width: 100px; height: 20px; margin: 5px;"></div>
Notes:					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	265.92(a)				
HANDLER SECTION (Fill out if RCRA Non-Notifier)					
Handler Name		Contact			
Street					
City		State	Zip Code		
County					
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)					
i. Indicate the Facility's current Universe(s):					
ii. Indicate the new RCRAInfo Generator Universe: <small>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.</small>		LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)		Transporter <input type="checkbox"/> <small>If the transporter box is checked, you must check at least one mode of transportation below:</small> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

RCRAInfo CM&E EVALUATION – VIOLATION FORM

FEB 16 2007
March 2006

1640

*EPA ID Number		PAD 048 603 005		EIN			
Handler Name		Boxentown Sanitary Disposal Co., Inc.					
Street		300 Menkel Rd.					
City		Albenterville		State	PA	Zip Code	19525
Actual Generator Status <small>Check only if different from Notified Status.</small>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Universe Change Required? <small>(Generator Status Change Required)</small>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete You must provide an Evaluation Identifier (also known as the Sequence Number).							
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
001	SNY FUI	7/21/2004	S	CSF	Waste WM		
Day Zero (mm/dd/yyyy): <small>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.</small>				Reclassified SV Date: <small>Only applicable for SNY evaluation type as appropriate.</small>			
Notes:							
Evaluation Indicator Field (Check all that apply)							
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI)							
Regulation-Specific FCI							
BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____							
Routine/Standardized FCI							
CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.			
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> If Yes, fill in information below.			
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) <small>(ex. FR 262.1)</small>		*Date Determined (mm/dd/yyyy)		
39	265.F	S	40 CFR 264.99(a)		9-9-2004		
38	265.A	S	40 CFR 265.111		9-9-2004		

*Required Fields

112



Violation List



BOYERTOWN SANITARY DISPOS

GILBERTSVILLE

PAD048603005

EPA Unaddressed SNC: N	EPA Addressed SNC: N	EPA SNC with Compliance Schedule Established: N
State Unaddressed SNC: Y	State Addressed SNC: N	State SNC with Compliance Schedule Established: N

[Show All Evaluations](#)
[Enforcements](#)
[Show All](#)

36 Violation(s) were found.

Enforcements

Page: 1

Go To

Violations										Evaluations		Enforcements	
	Act Loc	Seq #	Type	Determined Date	Deter By Agency	Resp Agency	Actual RTC Date	RTC Qual	Linked Citations	Count		Count	
1	PA	40	264.E	07/21/2006	S	S			264.73(b)	1	Show Evaluations	No enforcements found.	
2	PA	41	265.F	07/21/2006	S	S			265.92(a)	1	Show Evaluations	No enforcements found.	
3	PA	37	265.F	05/17/2005	S	S				1	Show Evaluations	No enforcements found.	
4	PA	39	264.N	09/09/2004	S	S				2	Show Evaluations	No enforcements found.	
5	PA	38	264.N	09/09/2004	S	S				2	Show Evaluations	No enforcements found.	
6	PA	34	262.A	09/16/2003	S	S				1	Show Evaluations	No enforcements found.	
7	PA	33	262.A	09/16/2003	S	S				1	Show Evaluations	No enforcements found.	
8	PA	31	264.G	09/11/2000	S	S				3	Show Evaluations	No enforcements found.	
9	PA	32	264.N	09/11/2000	S	S				3	Show Evaluations	No enforcements found.	
10	PA	30	264.N	10/23/1995	S	S				1	Show Evaluations	3	Show Enforcements
11	PA	29	264.N	10/23/1995	S	S	09/11/2000	O		2	Show Evaluations	3	Show Enforcements
12	PA	23	264.G	05/04/1995	S	S	09/11/2000	O		1	Show Evaluations	3	Show Enforcements
13	PA	27	264.G	04/25/1995	S	S	09/11/2000	O		1	Show Evaluations	3	Show Enforcements
14	PA	26	262.A	03/23/1995	S	S	09/11/2000	O		1	Show Evaluations	3	Show Enforcements
15	PA	24	264.D	03/17/1995	S	S	09/11/2000	O		2	Show Evaluations	3	Show Enforcements

Violations deleted at request of State

a start date of 4/18/07.

4. Regarding the violations specified: You have filled in only 2 outstanding violation and 1 RTC violation. However, in RCRAInfo there are 10 outstanding violations: I've attached the violation page from RCRAInfo. Please let me know which violations should be linked to the 4/18/07 inspection and whether any of the outstanding violations in RCRAInfo have already been RTC'd. If so, please provide the qualifier and RTC date. If we are missing any information (an inspection that RTC'd the violations, then please submit the Inspection Report and CME form for that inspection to me either by mail or fax).

[attachment "boyertown violation list.htm" deleted by Susie Chun/R3/USEPA/US]

If you have any questions or need additional information please let me know.

Thank you,

Susie Chun
Environmental Scientist
US EPA Region III
Technical Support Branch (3WC11)
Waste and Chemicals Management Division
1650 Arch Street
Philadelphia, PA 19103
Phone- (215) 814-2469
Fax - (215) 814-3113
chun.susie@epa.gov



Susie Chun/R3/USEPA/US

06/05/2007 12:10 PM

To kbauer@state.pa.us

cc Claudette Reed/R3/USEPA/US@EPA

bcc Susie Chun/R3/USEPA/US@EPA

Subject Fw: Boyertown Sanitary Disposal Co. - PAD048603005

Kevin,

Thank you for all the information in cleaning up this data. This is just to confirm what we discussed on the phone.

I will be changing Violation Seq # 30 to 265.G with a citation of 265.111 (determined date 10/23/1995)

I will be changing Violation Seq # 34 to 264.F with a citation of 264.99(a)

I will also be keeping Violation Seq 40.

All other violations will be deleted except 40 and 41.
All evaluation after 1995 will be linked to the outstanding violations of 30.

All evaluations after 2003 will be linked to the outstanding violations of 30 and 34.

Violation Seq 41 will be RTC with the 4/18/07 inspection

If you have any questions or need additional information please let me know.

Thank you,

Susie Chun

Environmental Scientist

US EPA Region III

Technical Support Branch (3WC11)

Waste and Chemicals Management Division

1650 Arch Street

Philadelphia, PA 19103

Phone- (215) 814-2469

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----- Forwarded by Susie Chun/R3/USEPA/US on 06/05/2007 12:05 PM -----



Susie Chun/R3/USEPA/US

05/30/2007 02:11 PM

To SMICHLER@STATE.PA.US

cc: Claudette Reed/R3/USEPA/US@EPA

Subject Boyertown Sanitary Disposal Co. - PAD048603005

Susan,

This e-mail is in regards to an inspection performed on 4/18/07 at Boyertown Sanitary. The following needs clarification before the CME forms can be inputted into RCRAInfo.

1. SNY evaluations are never linked to violations. In the future, you need to submit one CME form for the violation and a separate CME form for the SNY evaluation. This is also the case for SNN.
2. From what I can gather, you want the Day Zero for the SNY to be 9/9/04.
3. I will add an CME form with a CEI evaluation for the date of 4/18/07. The SNY CME form will also have

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection 4/18/2007 Identification Number PAD048603005

Company/Facility/Site Name Boyertown Sanitary Disposal Company

- 5) The observations noted in paragraphs (3) and (4) above correct the outstanding violation of 40 CFR Section 264.73 (a) and (b) ("Written operating record..."). The following violations remain outstanding:
- a. 40 CFR Section 265.111 (b) "Operator prevents leachate from leaking into the ground"
 - b. 40 CFR Section 265.92 (a) "Groundwater sampling plan developed and implemented"
 - c. 40 CFR Section 264.99 (a) "Groundwater monitoring performed"
- 6) A Compliance Order (CO) was issued on September 9, 2004 to Warren Frame, Kenneth Frame, and BSDC. This CO required the responsible parties to remove and properly dispose of waste from land clearing, grubbing and excavation (LCGE). At the time of inspection, no new LCGE waste was observed to have been brought onsite. Some remaining material was observed to have been moved to one side of the area. BSDC is reminded that the stumps, branches and roots should be disposed of at a permitted facility. Mr. Frame pledged to have the remaining exposed branches removed from the clean fill within thirty (30) days of this inspection, to ensure that they would not be buried.

In summary, three (3) outstanding violations remain. A copy of this report was mailed to the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed to facility Date 4/23/2007

Inspector (signature) [Signature] Date 4/23/2007

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection 4/18/2007 Identification Number PAD048603005

Company/Facility/Site Name Boyertown Sanitary Disposal Company

On this date, Susan Michler and Charlie Fees of the Department conducted a routine hazardous waste treatment, storage and disposal (TSD) inspection and a municipal waste compliance inspection at Boyertown Sanitary Disposal Company (BSDC), located in Douglass Township, Montgomery County. Mr. Warren Frame, President, granted access to the facility and was the facility guide for the inspection. The following observations were made:

- 1) At the time of inspection, the treated and raw leachate lagoons had the required two (2) feet of freeboard. Mr. Frame explained that the impoundment liner, which was determined to have been leaking by BSDC, had not been repaired. A large break/fold in the liner was observed in the treated lagoon A. At the time of inspection, lagoon A was being discharged to the sewer authority. Mr. Frame stated that takes approximately twelve to fourteen (12-14) days to discharge because he can only discharge a maximum rate of 12 gallons/minute. At the time of inspection, the flowmeter read 9.9 gallons/minute.
- 2) At the time of inspection, the main gas flare was not on. No landfill gas odors were detected.
- 3) Mr. Frame collects treated leachate samples every six (6) batches. Lagoon A and B are each considered one (1) batch. The leachate samples are collected from in between the two (2) carbon columns. Samples are sent to Blue Marsh Laboratories, located in Douglassville PA. Mr. Frame explained that raw leachate samples are collected and analyzed annually, and a priority pollutant test is analyzed on the treated leachate annually. Chemical analysis were reviewed for 2006-2007 and found to be complete.
- 4) The monthly operations reports for the treatment plant were reviewed from August 2006- February 2007. This report includes the hours of operation, basin utilized (A or B), flowmeter readings, gallons discharged, pH, carbon change date, and comments (when sock filter was replaced). According to these reports, BSDC discharges an average of 140,000 gallons from lagoons A and B every two (2) months. The Department recommends that Mr. Frame obtain a copy of the monthly operations report for December. BSDC is reminded that they should be conducting routine inspections of the lagoons, including leachate levels and liner conditions, and that these inspections should be documented.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed to facility Date 4/25/2007

Inspector (signature) Susan Michler Date 4/23/2007

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
	X			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71		H233
	X			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	X			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
		X		Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
	X			Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
	X			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
			X	Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
		X		Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
		X		Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
		X		Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
		X		Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
		X		All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
		X		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
			X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT**Hazardous Waste Inspection Report
TSD Facilities - Part B**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	264a.1 265a.1	264.17(a) 265.17(a)	H217
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
	X			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
	X			Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
	X			Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
	X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes action taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name Boyertown Sanitary Disposal Co. ID Number PAD048603005 Date 4/18/2007

Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
		X		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



HW: 1616399
MW: 1616403

HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES – PART A

Company, installation name Boyertown Sanitary Disposal Company

Name of Inspector Susan Michler and Charlie Fees

Location 300 Merkel Rd. Gilbertsville PA 19525

County Montgomery Municipality Douglass Twp.

EPA I.D. Number PAD048603005 Employer I.D. Number (EIN) _____

Name of responsible official Warren Frame

Title President

Mailing Address 1205 Pottstown Pike Glenmoore PA 19343

Area code and telephone number 610321-1236

Name of person interviewed Warren Frame

Mailing address (*if different from above*) _____

Area code and telephone number _____

1. Site Characterization: ☒ Treatment ☐ Storage ☐ Disposal

Check all that apply:

- | | | |
|--|--|---------------------------------------|
| <input checked="" type="checkbox"/> surface impoundments | <input type="checkbox"/> tanks | <input type="checkbox"/> incineration |
| <input type="checkbox"/> chemical treatment | <input type="checkbox"/> containers | <input type="checkbox"/> BIF |
| <input type="checkbox"/> physical treatment | <input type="checkbox"/> waste piles | <input type="checkbox"/> recycle |
| <input checked="" type="checkbox"/> biological treatment | <input type="checkbox"/> containment bldg. | <input type="checkbox"/> landfill |
| <input type="checkbox"/> Other | Specify _____ | |

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

F039 Multisource leachate

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

EPA ID Number			Handler Name		
PAD048603005			Boyertown Sanitary Disposal Co.		
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
40	264.E	S	7/21/2006	D A RTC Qualifier is required if entering an Actual RTC Date.	4/18/2007
Notes: _____					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	264.73 (a)(b)				
VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete					Link to Above Evaluation <input type="checkbox"/>
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
Notes: _____					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
HANDLER SECTION (Fill out if RCRA Non-Notifier)					
Handler Name		Contact			
Street					
City	State	Zip Code			
County					
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)					
i. Indicate the Facility's current Universe(s):					
ii. Indicate the new RCRAInfo Generator Universe: <i>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form</i>			LQG <input type="checkbox"/>	SQG <input type="checkbox"/>	CEG <input type="checkbox"/>
			Non-Handler <input type="checkbox"/>	Closed <input type="checkbox"/>	
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)		Transporter <input type="checkbox"/> <i>If the transporter box is checked, you must check at least one mode of transportation below:</i> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD048603005			EIN	
Handler Name		Boyertown Sanitary Disposal Co.				
Street	300 Merkel Rd.					
City	Gilbertsville	State	PA	Zip Code	19525	
Actual Generator Status <i>Check only if different from Notified Status.</i>		LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>				
Universe Change Required? <i>(Generator Status Change Required)</i>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).				
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).				
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).				
*EVALUATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete <i>You must provide an Evaluation Identifier (also known as the Sequence Number).</i>						
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization	
001	SNY	4/18/2007	S	SBM	WM	
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.			4/18/07 9/9/2004	Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.		
Notes:						
Evaluation Indicator Field (Check all that apply)						
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C						
Focused Coverage Areas (Use Only for Evaluation Type FCI)						
Regulation-Specific FCI						
BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____						
Routine/Standardized FCI						
CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>						
Does this Evaluation Add/Update/Delete a Violation?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.		
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.		
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.		
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> If Yes, fill in information below.						
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)	*Date Determined (mm/dd/yyyy)		
34	264.F	S	264.99 (a)	9/9/2004 9/14/05		
30	265.G	S	265.111(b)	9/9/2004 10/23/05		

*Required Fields

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
<p>7. Samples from background and downgradient wells must be properly collected and analyzed. (Continued)</p>	<ul style="list-style-type: none"> • use of sample containers that may interfere with sample quality (e.g., synthetic containers used with volatile samples). • failure to make proper use of sample blanks. 	<p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p> <p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p>

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
3. Background wells must be located so as to yield samples that are not affected by the facility.	• failure of the o/o to consider the effect of local withdrawal wells on ground-water flow direction.	§265.90(a) §265.91(a)(1)
	• failure of the o/o to obtain sufficient water level measurements.	§265.90(a) §265.91(a)(1)
	• failure of the o/o to consider flow path of dense immiscibles in establishing upgradient well locations.	§265.90(a) §265.91(a)(1)
	• failure of the o/o to consider seasonal fluctuations in ground-water flow direction.	§265.90(a) §265.91(a)(1)
	• failure to install wells hydraulically upgradient, except in cases where upgradient water quality is affected by the facility (e.g., migration of dense immiscibles in the upgradient direction, mounding water beneath the facility).	§265.90(a) §265.91(a)(1)
	• failure of the o/o to adequately characterize subsurface hydrogeology.	§265.90(a) §265.91(a)(1)
	• wells intersect only ground water that flows around facility.	§265.90(a) §265.91(a)(1)
4. Background wells must be constructed so as to yield samples that are representative of in-situ ground-water quality.	• wells constructed of materials that may release or absorb constituents of concern	§265.90(a) §265.91(a)
	• wells improperly sealed—contamination of sample is a concern.	§265.90(a) §265.91(a), (c)
	• nested or multiple screen wells are used and it cannot be demonstrated that there has been no movement of ground water between strata.	§265.90(a) §265.91(a)(1, 2)

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
<p>6. Downgradient monitoring wells must be constructed so as to yield samples that are representative of in-situ ground-water quality.</p>	<p>See No. 4 above.</p>	
<p>7. Samples from background and downgradient wells must be properly collected and analyzed.</p>	<ul style="list-style-type: none"> • failure to evacuate stagnant water from the well before sampling. • failure to sample wells within a reasonable amount of time after well evacuation. • improper decisions regarding filtering or non-filtering of samples prior to analysis (e.g., use of filtration on samples to be analyzed for volatile organics). • use of an inappropriate sampling device. • use of improper sample preservation techniques. 	<p>§265.90(a), §265.92(a) §265.93(d)(4) §2705.14(c)(4)</p> <p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p> <p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p> <p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p> <p>§265.90(a) §265.92(a) §265.93(d)(4) §270.14(c)(4)</p>

Figure 4.3
Relationship of Technical Inadequacies to
Ground-Water Performance Standards

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
1. Uppermost Aquifer must be correctly identified.	<ul style="list-style-type: none"> • failure to consider aquifers hydraulically interconnected to the uppermost aquifer. • incorrect identification of certain formations as confining layers or aquitards. • failure to use test drilling and/or soil borings to characterize subsurface hydrogeology. 	<p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p> <p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p> <p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p>
2. Ground-water flow directions and rates must be properly determined.	<ul style="list-style-type: none"> • failure to use piezometers or wells to determine ground-water flow rates and directions (or failure to use a sufficient number of them). • failure to consider temporal variations in water levels when establishing flow directions (e.g., seasonal variations, short-term fluctuations due to pumping). • failure to assess significance of vertical gradients when evaluating flow rates and directions. • failure to use standard/consistent benchmarks when establishing water level elevations. • failure of the owner/operator (o/o) to consider the effect of local withdrawal wells on ground-water flow direction. • failure of the o/o to obtain sufficient water level measurements. 	<p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p> <p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p> <p>§265.90(a) §265.91(a)(1, 2) §270.14(c)(2)</p> <p>§265.90(a) §265.91(a)(1)</p> <p>§265.90(a) §265.91(a)(1)</p>

	Y/N
VIII. Conclusions	
A. Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator?	N
B. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility?	N
C. Does the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility?	N

	Y/N
2. Documentation of analytical results for:	
a. Blanks?	N/A
b. Standards?	
c. Duplicates?	
d. Spiked samples?	
e. Detectable limits for each parameter being analyzed?	
C. Are approved statistical methods used?	
D. Are QC samples used to correct data?	
E. Are all data critically examined to ensure it has been properly calculated and reported?	
VII. Surficial Well Inspection and Field Observation	
A. Are the wells adequately maintained?	
B. Are the monitoring wells protected and secure?	
C. Do the wells have surveyed casing elevations?	
D. Are the ground-water samples turbid?	
E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?	
F. Has a site sketch been prepared by the field inspector with scale, north arrow, location(s) of buildings, location(s) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern?	

	Y/N
—Unusual well recharge rates?	N/A
—Equipment malfunction(s)?	
—Possible sample contamination?	
—Sampling rate?	
D. Chain-of-Custody Record	
1. Is a chain-of-custody record included with each sample?	
2. Does it document the following:	
a. Sample number?	
b. Signature of collector?	
c. Date and time of collection?	
d. Sample type?	
e. Station location?	
f. Number of containers?	
g. Parameters requested?	
h. Signatures of persons involved in chain-of-custody?	
i. Inclusive dates of custody?	
E. Sample Analysis Request Sheet	
1. Does a sample analysis request sheet accompany each sample?	
2. Does the request sheet document the following:	
a. Name of person receiving the sample?	
b. Date of sample receipt?	
c. Duplicates?	
d. Analysis to be performed?	
IV. Review of Quality Assurance/Quality Control	
A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program?	
B. Does the QA/QC program include:	
1. Documentation of any deviation from approved procedures?	

	Y/N
V. Review of Chain-of-Custody Procedures	
A. Sample Labels	
1. Are sample labels used?	N/A
2. Do they provide the following information:	
a. Sample identification number?	
b. Name of collector?	
c. Date and time of collection?	
d. Place of collection?	
e. Parameter(s) requested and preservatives used?	
3. Do they remain legible even if wet?	
B. Sample Seals	
1. Are sample seals placed on those containers to ensure samples are not altered?	
C. Field Logbook	
1. Is a field logbook maintained?	
2. Does it document the following:	
a. Purpose of sampling (e.g., detection or assesment)?	
b. Location of well(s)?	
c. Total depth of each well?	
d. Static water level depth and measurement technique?	
e. Presence of immiscible layers and detection method?	
f. Collection method for immiscible layers and sample identification numbers?	
g. Well evacuation procedures?	
h. Sample withdrawal procedure?	
i. Date and time of collection?	
j. Well sampling sequence?	
k. Types of sample containers and sample identification number(s)?	
l. Preservative(s) used?	
m. Parameters requested?	
n. Field analysis data and method(s)?	
o. Sample distribution and transporter?	
p. Field observations?	

	Y/N
2. Are samples for the following analyses field acidified to pH ≤ 2 with HNO_3 :	
a. Iron?	N/A
b. Manganese?	
c. Sodium?	
d. Total metals?	
e. Dissolved metals?	
f. Fluoride?	
g. Endrin?	
h. Lindane?	
i. Methoxychlor?	
j. Toxaphene?	
k. 2,4, D?	
l. 2,4,5 TP Silvex?	
m. Radium?	
n. Gross alpha?	
o. Gross beta?	
3. Are samples for the following analyses field acidified to pH ≤ 2 with H_2SO_4 :	
a. Phenols?	
b. Oil and grease?	
4. Is the sample for TOC analyses field acidified to pH ≤ 2 with HCl ?	
5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?	
6. Is the sample for cyanide analysis preserved with NaOH to pH > 12 ?	
C. Special Handling Considerations	
1. Are organic samples handled without filtering?	
2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample?	
3. Are samples for metal analysis split into two portions?	
4. Is the sample for dissolved metals filtered through a 0.45 micron filter?	
5. Is the second portion not filtered and analyzed for total metals?	
6. Is one equipment blank prepared each day of ground-water sampling?	✓

	Y/N
2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps?	N/A
3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps?	
4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined?	
5. Are the sample containers for metal analyses cleaned using these sequential steps:	
a. Nonphosphate detergent wash?	
b. 1:1 nitric acid rinse?	
c. Tap water rinse?	
d. 1:1 hydrochloric acid rinse?	
e. Tap water rinse?	
f. Distilled/deionized water rinse?	
6. Are the sample containers for organic analyses cleaned using these sequential steps:	
a. Nonphosphate detergent/hot water wash?	
b. Tap water rinse?	
c. Distilled/deionized water rinse?	
d. Acetone rinse?	
e. Pesticide-grade hexane rinse?	
7. Are trip blanks used for each sample container type to verify cleanliness?	
B. Sample Preservation Procedures	
1. Are samples for the following analyses cooled to 4°C:	
a. TOC?	
b. TOX?	
c. Chloride?	
d. Phenols?	
e. Sulfate?	
f. Nitrate?	
g. Coliform bacteria?	
h. Cyanide?	
i. Oil and grease?	
j. Hazardous constituents (261, Appendix VIII)?	

	Y/N
12. Is sampling equipment thoroughly dry before use?	N/A
13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred?	
14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min?	
F. In-situ or Field Analyses	
1. Are the following labile (chemically unstable) parameters determined in the field:	
a. pH?	
b. Temperature?	
c. Specific conductivity?	
d. Redox potential?	
e. Chlorine?	
f. Dissolved oxygen?	
g. Turbidity?	
h. Other (specify) _____	
2. For in-situ determinations, are they made after well evacuation and sample removal?	
3. If sample is withdrawn from the well, is parameter measured from a split portion?	
4. Is monitoring equipment calibrated according to manufacturers' specifications and consistent with SW-846?	
5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook?	
IV. Review of Sample Preservation and Handling Procedures	
A. Sample Containers	
1. Are samples transferred from the sampling device directly to their compatible containers?	✓

	Y/N
E. Sample Withdrawal	
1. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers?	N/A
2. Are samples withdrawn with either fluorocarbon/resins or stainless steel (316, 304 or 2205) sampling devices?	
3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps?	
4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer?	
5. If bladder pumps are used, are they operated in a continuous manner to prevent aeration of the sample?	
6. If bailers are used, are they lowered slowly to prevent degassing of the water?	
7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration?	
8. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well?	
9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples?	
10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps: a. Dilute acid rinse (HNO ₃ or HCl)?	
11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps:	
a. Nonphosphate detergent wash?	
b. Tap water rinse?	
c. Distilled/deionized water rinse?	
d. Acetone rinse?	
e. Pesticide-grade hexane rinse?	✓

	Y/N
III. Review of Sample Collection Procedures	
A. Measurement of Well Depths /Elevation	
1. Are measurements of both depth to standing water and depth to the bottom of the well made?	N/A
2. Are measurements taken to the 0.01 feet?	
3. What device is used?	
4. Is there a reference point established by a licensed surveyor?	
5. Is the measuring equipment properly cleaned between well locations to prevent cross contamination?	
B. Detection of Immiscible Layers	
1. Are procedures used which will detect light phase immiscible layers?	
2. Are procedures used which will detect heavy phase immiscible layers?	
C. Sampling of Immiscible Layers	
1. Are the immiscible layers sampled separately prior to well evacuation?	
2. Do the procedures used minimize mixing with watersoluble phases?	
D. Well Evacuation	
1. Are low yielding wells evacuated to dryness?	
2. Are high yielding wells evacuated so that at least three casing volumes are removed?	
3. What device is used to evacuate the wells?	
4. If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook?	

	Y/N
c. Are the procedures used to make a first determination of contamination adequate?	N
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	Y
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes?	Y
f. Are the assessment monitoring wells adequately designed and constructed?	unk.
g. Are the sampling and analysis procedures adequate to provide true measures of contamination?	Y
h. Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume?	N
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration?	N
j. Is the schedule of implementation adequate?	N
k. Is the owner/operator's assessment monitoring plan adequate?	N
• If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily?	N
II. Field Evaluation	
A. Ground-Water Monitoring System	
1. Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3.)	N/A
B. Monitoring Well Construction	
1. Identify construction material material diameter	
a. Primary Casing _____	
b. Secondary or outside casing _____	
2. Is the upper portion of the borehole sealed with concrete to prevent infiltration from the surface?	
3. Is the well fitted with an above-ground protective device?	
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	✓

	Y/N
b. Were appropriate methods used to establish ground-water flowpaths?	Y
c. Did the owner/operator provide accurate documentation?	N
d. Are the potentiometric surface measurements valid?	N
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water?	N
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site?	N
3. Uppermost Aquifer	
a. Did the owner/operator adequately define the upper-most aquifer?	Y
4. Monitoring Well Construction and Design	
a. Do the design and construction of the owner/operator's ground-water monitoring wells permit depth discrete ground-water samples to be taken?	Y
b. Are the samples representative of ground-water quality?	N
c. Are the ground-water monitoring wells structurally stable?	Y
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics?	Y
5. Detection Monitoring	
a. Downgradient Wells <ul style="list-style-type: none"> • Do the location, and screen lengths of the ground-water monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer? 	unk.
b. Upgradient Wells <ul style="list-style-type: none"> • Do the location and screen lengths of the upgradient (background) ground-water monitoring wells ensure the capability of collecting ground-water samples representative of upgradient (background) ground-water quality including any ambient heterogeneous chemical characteristics? 	Y
6. Assessment Monitoring	
a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration?	Y
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release?	unk.

	Y/N
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis?	N
8. Are the indirect methods to be used based on reliable and accepted geophysical techniques?	N/A
a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site?	N/A
b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site?	Y
c. Is the method appropriate considering the nature of the subsurface materials?	Y
d. Does the approach consider the limitations of these methods?	Y
e. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to further substantiate the findings.)	Y
9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement?	N
a. Will site specific measurements be utilized to accurately portray the subsurface?	unk.
b. Will the derived data be reliable?	unk.
c. Have the assumptions been identified?	unk.
d. Have the physical and chemical properties of the site-specific wastes and hazardous waste constituents been identified?	Y
J. Conclusions	
1. Subsurface geology	Y
a. Has sufficient data been collected to adequately define petrography and petrographic variation?	Y
b. Has the subsurface geochemistry been adequately defined?	Y
c. Was the boring/coring program adequate to define subsurface geologic variation?	Y
d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data?	Y
e. Does the geologic assessment address or provide means to resolve any information gaps?	Y
2. Ground-water flowpaths	Y
a. Did the owner/operator adequately establish the horizontal and vertical components of ground-water flow?	Y

	Y/N
a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents?	Y
b. Does the owner/operator provide documentation for the listed wastes which are not included?	N/A
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water?	N
4. Has the owner/operator specified a schedule of implementation in the assessment plan?	N
5. Have the assessment monitoring objectives been clearly defined in the assessment plan?	Y
a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells?	Y
b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility?	Y
c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water?	Y
d. Does the plan employ a quarterly monitoring program?	Y
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase?	Y
a. Is the role of each method in the evaluation fully described?	N
b. Does the plan provide sufficient descriptions of the direct methods to be used?	N
c. Does the plan provide sufficient descriptions of the indirect methods to be used?	N
d. Will the method contribute to the further characterization of the contaminant movement?	Y
7. Are the investigatory techniques utilized in the assessment program based on direct methods?	Y
a. Does the assessment approach incorporate indirect methods to further support direct methods?	N
b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring?	N
c. Are the procedures well defined?	Y
d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells?	Y

	Y/N
H. Evaluation of the Facility's Detection Monitoring Program	
1. Placement of Downgradient Detection Monitoring Wells	Y
a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area?	
b. How far apart are the detection monitoring wells? 100' - 1500'	-
c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster?	Y
d. Does the owner/operator identified the well screen lengths of each monitoring well or clusters?	Y
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster?	N
f. Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator?	Y
2. Placement of Upgradient Monitoring Wells	
a. Has the owner/operator documented the location of each upgradient monitoring well or cluster?	Y
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells?	Y
c. What length screen has the owner/operator employed in the background monitoring well(s)? 10' into first water-bearing zone	-
d. Does the owner/operator provide an explanation for the screen length(s) chosen?	Y
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator?	Y
I. Office Evaluation of the Facility's Assessment Monitoring Program	
1. Does the assessment plan specify:	Y
a. The number, location, and depth of wells?	
b. The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases?	Y
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility?	Y

	Y/N
• What are the dimensions of the filter pack? <u>unknown</u>	—
• Has a turbidity measurement of the well water ever been made?	Y
• Have the filter pack and screen been designed for the insitu materials?	Y
c. Well development	
• Was the well developed?	Y
• What technique was used for well development? —Surge block —Bailer ✓ Air surging ✓ Water pumping —Other (specify) _____	—
4. Annular Space Seals	
a. What is the annular space in the saturated zone directly above the filter pack filled with: ✓ Sodium bentonite (specify type and grit) <u>granular pellets</u> —Cement (specify neat or concrete) —Other (specify)	—
b. Was the seal installed by: —Dropping material down the hole and tamping —Dropping material down the inside of hollow-stem auger <u>unk.</u> —Tremie pipe method —Other (specify)	—
c. Was a different seal used in the unsaturated zone? If yes,	N
• Was this seal made with? —Sodium bentonite (specify type and grit) —Cement (specify neat or concrete)- Other (specify)	N/A
• Was this seal installed by? —Dropping material down the hole and tamping —Dropping material down the inside of hollow stem auger —Other (specify)	—
d. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface?	Y
e. Is the well fitted with an above-ground protective device and bumper guards?	Y
f. Has the protective cover been installed with locks to prevent tampering?	Y

	Y/N
• Were formation samples collected initially during drilling?	Y
• Were any cores taken continuous?	Y
• If not, at what interval were samples taken?	—
• How were the samples obtained?	
—Split spoon	
—Shelby tube	
<input checked="" type="checkbox"/> Core drill	
—Other (specify)	
• Identify if any physical and/or chemical tests were performed on the formation samples (specify)	
_____	N/A

2. Monitoring Well Construction Materials	
a. Identify construction materials (by number) and diameters (ID/OD)	
• Primary Casing	<u>PVC</u> <u>4"</u>
• Secondary or outside casing (double construction)	<u>steel</u> <u>6"</u>
• Screen	<u>PVC</u> <u>4"</u>
b. How are the sections of casing and screen connected?	
• Pipe sections threaded	N
• Couplings (friction) with adhesive or solvent	N
• Couplings (friction) with retainer screws	Y
• Other (specify)	N
c. Were the materials steam-cleaned prior to installation?	
• If no, how were the materials cleaned? _____	Y
3. Well Intake Design and Well Development	
a. Was a well intake screen installed?	
• What is the length of the screen for the well?	Y
<u>10'</u>	—
• Is the screen manufactured?	Y
b. Was a filter pack installed?	
• What kind of filter pack was employed?	Y
<u>clean quartz sand</u>	—
• Is the filter pack compatible with formation materials?	Y
• How was the filter pack installed?	—
<u>dropped into well and tamped</u>	

	Y/N
<p>d. Does potential for other hydraulic communication exist (e.g., lateral discontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? If yes or no, what is the rationale?</p> <p><u>Regional Fractures in the Brunswick Formation</u></p>	Y
<p>G. Office Evaluation of the Facility's Ground-Water Monitoring System— Monitoring Well Design and Construction:</p> <p>These questions should be answered for each different well design present at the facility.</p> <p>1. Drilling Methods</p> <p>a. What drilling method was used for the well?</p> <ul style="list-style-type: none"> • Hollow-stem auger <input type="checkbox"/> • Solid-stem auger <input type="checkbox"/> • Mud rotary <input type="checkbox"/> • Air rotary <input type="checkbox"/> • Reverse rotary <input checked="" type="checkbox"/> • Cable tool <input type="checkbox"/> • Jetting <input type="checkbox"/> • Air drill w/ casing hammer <input type="checkbox"/> • Other (specify) _____ 	
<p>b. Were any cutting fluids (including water) or additives used during drilling? If yes, specify:</p> <ul style="list-style-type: none"> • Type of drilling fluid _____ • Source of water used _____ • Foam _____ • Polymers _____ • Other _____ 	N/A
c. Was the cutting fluid, or additive, identified?	N/A
<p>d. Was the drilling equipment steam-cleaned prior to drilling the well?</p> <ul style="list-style-type: none"> • Other methods _____ 	Y
<p>e. Was compressed air used during drilling? If yes,</p> <ul style="list-style-type: none"> • was the air filtered to remove oil? 	Y/Y
<p>f. Did the owner/operator document procedure for establishing the potentiometric surface? If yes,</p> <ul style="list-style-type: none"> • how was the location established? 	N
g. Formation samples	

	Y/N
e. Did the owner/operator implement means for gauging long term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns?	N
3. Hydraulic conductivity	
a. How were hydraulic conductivities of the subsurface materials determined?	
• Single-well tests (slug tests)?	N
• Multiple-well tests (pump tests)	Y
• Other (specify) _____	-
b. If single-well tests were conducted, was it done by:	
• Adding or removing a known volume of water?	N/A
• Pressurizing well casing?	N/A
c. If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels?	UNK.
d. Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit?	N/A
e. Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)?	N/A
f. Were other hydraulic conductivity properties determined?	Y
g. If yes, provide any of the following data, if available:	
• Transmissivity _____	
• Storage coefficient _____	
• Leakage _____	
• Permeability _____	
• Porosity _____	
• Specific capacity <u>0.05 gpm/ft</u>	
• Other (specify) _____	
4. Identification of the uppermost aquifer	
a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes,	Y
• Are soil boring/test pit logs included?	N
• Are geologic cross-sections included?	N
b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? If yes,	Y
• how was continuity demonstrated? _____	-
c. What is hydraulic conductivity of the confining unit (if present)? CM/Sec How was it determined? <u>$5 \times 10^{-7} \text{ cm/s}$ to $6.1 \times 10^{-7} \text{ cm/s}$</u>	-

	Y/N
f. Did the owner/operator provide construction details for the piezometers?	N
g. How were the static water levels measured (check method[s]).	
• Electric water sounder <input checked="" type="checkbox"/>	
• Wetted tape <input type="checkbox"/>	
• Air line <input type="checkbox"/>	
• Other (explain) _____	
h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone?	Y
i. Has the owner/operator provided a site water table (potentiometric) contour map?	Y
If yes,	
• Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data)	Y
• Are ground-water flow-lines indicated?	Y
• Are static water levels shown?	Y
• Can hydraulic gradients be estimated?	Y
j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells?	N
k. Do the owner/operator's flow nets include:	
• piezometer locations?	N
• depth of screening?	N
• width of screening?	N
• measurements of water levels from all wells and piezometers?	N
2. Seasonal and temporal fluctuations in ground-water	
a. Do fluctuations in static water levels occur? If yes, are the fluctuations caused by any of the following:	Y
—Off-site well pumping	N
—Tidal processes or other intermittent natural variations (e.g., river stage, etc.)	N
—On-site well pumping	N
—Off-site, on-site construction or changing land use patterns	N
—Deep well injection	N
—Seasonal variations	N
—Other (specify) _____	N
b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management?	Y
c. Do water level fluctuations alter the general ground-water gradients and flow directions?	Y
d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone?	Y

	Y/N
• location of borehole?	N
• depth of termination?	N
• location of screen (if applicable)?	N
• depth of zone(s) of saturation?	N
• backfill procedure?	N
3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor?	Y
4. Does the topographic map provide:	
a. contours at a maximum interval of two-feet?	Y
b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drain, pipelines, etc.)?	Y
c. descriptions of nearby water bodies?	Y
d. descriptions of off-site wells?	N/A
e. site boundaries?	Y
f. individual RCRA units?	Y
g. delineation of the waste management area(s)?	Y
h. well and boring locations?	Y
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features?	N
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?	N
F. Identification of Ground-Water Flowpaths	
1. Ground-water flow direction	Y
a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?	
b. Were the well water level measurements taken within a 24 hour period?	Y
c. Were the well water level measurements taken to the nearest 0.01 feet?	Y
d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements?	Y
e. Was the water level information obtained from (check appropriate one):	
• multiple piezometers placed in single borehole? _____	
• vertically nested piezometers in closely spaced separate _____	
• boreholes? _____	
• monitoring wells? <u>✓</u>	

	Y/N
—soil type?	N
—approximate bulk geochemistry?	N
—existence of microstructures that may effect or indicate fluid flow?	Y
• Falling head tests?	Y
• Static head tests?	Y
• Settling measurements?	N
• Centrifuge tests?	N
• Column drawings?	N
D. Verification of Subsurface Geological Data	
1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations?	N
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically low water-bearing units?	Y
3. Is the confining layer laterally continuous across the entire site?	N
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer?	Y
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data?	N
6. Do the laboratory data corroborate the field data for petrography?	Y
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	N/A
E. Presentation of Geologic Data	
1. Did the owner/operator present geologic cross sections of the site?	Y
2. Do cross sections:	
a. identify the types and characteristics of the geologic materials present?	Y
b. define the contact zones between different geologic materials?	Y
c. note the zones of high permeability or fracture?	Y
d. give detailed borehole information including:	N

	Y/N
Auger (hollow or solid stem) _____	
Mud rotary _____	
Reverse rotary <input checked="" type="checkbox"/> _____	
Cable tool _____	
Jetting _____	
Other (specify) _____	
e. Were continuous sample corings taken?	Y
f. How were the samples obtained (checked method[s])	
• Split spoon <input checked="" type="checkbox"/> _____	
• Shelby tube, or similar _____	
• Rock coring <input checked="" type="checkbox"/> _____	
• Ditch sampling _____	
• Other (explain) _____	
g. Were the continuous sample corings logged by a qualified professional in geology?	Y
h. Does the field boring log include the following information:	
• Hole name/number?	Y
• Date started and finished?	Y
• Driller's name?	Y
• Hole location (i.e., map and elevation)?	Y
• Drill rig type and bit/auger size?	Y
• Gross petrography (e.g., rock type) of each geologic unit?	Y
• Gross mineralogy of each geologic unit?	Y
• Gross structural interpretation of each geologic unit and structural features (e.g., fractures, gouge material, solution channels, buried streams or valleys, identification of depositional material)?	Y
• Development of soil zones and vertical extent and description of soil type?	Y
• Depth of water bearing unit(s) and vertical extent of each?	Y
• Depth and reason for termination of borehole?	Y
• Depth and location of any contaminant encountered in borehole?	N/A
• Sample location/number?	Y
• Percent sample recovery?	Y
• Narrative descriptions of:	
—Geologic observations?	Y
—Drilling observations?	Y
i. Were the following analytical tests performed on the core samples:	
• Mineralogy (e.g., microscopic tests and x-ray diffraction)?	N
• Petrographic analysis:	
—degree of crystallinity and cementation of matrix?	Y
—degree of sorting, size fraction (i.e., sieving), textural variations?	N
—rock type(s)?	Y

	Y/N
g. Water table/potentiometric map?	Y
h. Hydrologic cross sections?	N
6. Did the owner/operator obtain a regional map of the area and delineate the facility?	Y
If yes, does this map illustrate:	
a. Surficial geology features?	Y
b. Streams, rivers, lakes, or wetlands near the facility?	Y
c. Discharging or recharging wells near the facility?	Y
7. Did the owner/operator obtain a regional hydrogeologic map?	Y
If yes, does this hydrogeologic map indicate:	
a. Major areas of recharge/discharge?	Y
b. Regional ground-water flow direction?	Y
c. Potentiometric contours which are consistent with observed water level elevations?	Y
8. Did the owner/operator prepare a facility site map?	Y
If yes, does the site map show:	
a. Regulated units of the facility (e.g., landfill areas, impoundments)?	Y
b. Any seeps, springs, streams, ponds, or wetlands?	Y
c. Location of monitoring wells, soil borings, or test pits?	Y
d. How many regulated units does the facility have? <u>1</u>	Y
If more than one regulated unit then,	
• Does the waste management area encompass all regulated units?	N/A
• Is a waste management area delineated for each regulated unit?	N/A
C. Characterization of Subsurface Geology of Site	
1. Soil boring/test pit program:	
a. Were the soil borings/test pits performed under the supervision of a qualified professional?	Y
b. Did the owner/operator provide documentation for selecting the spacing for borings?	Y
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock?	unk.
d. Indicate the method(s) of drilling:	

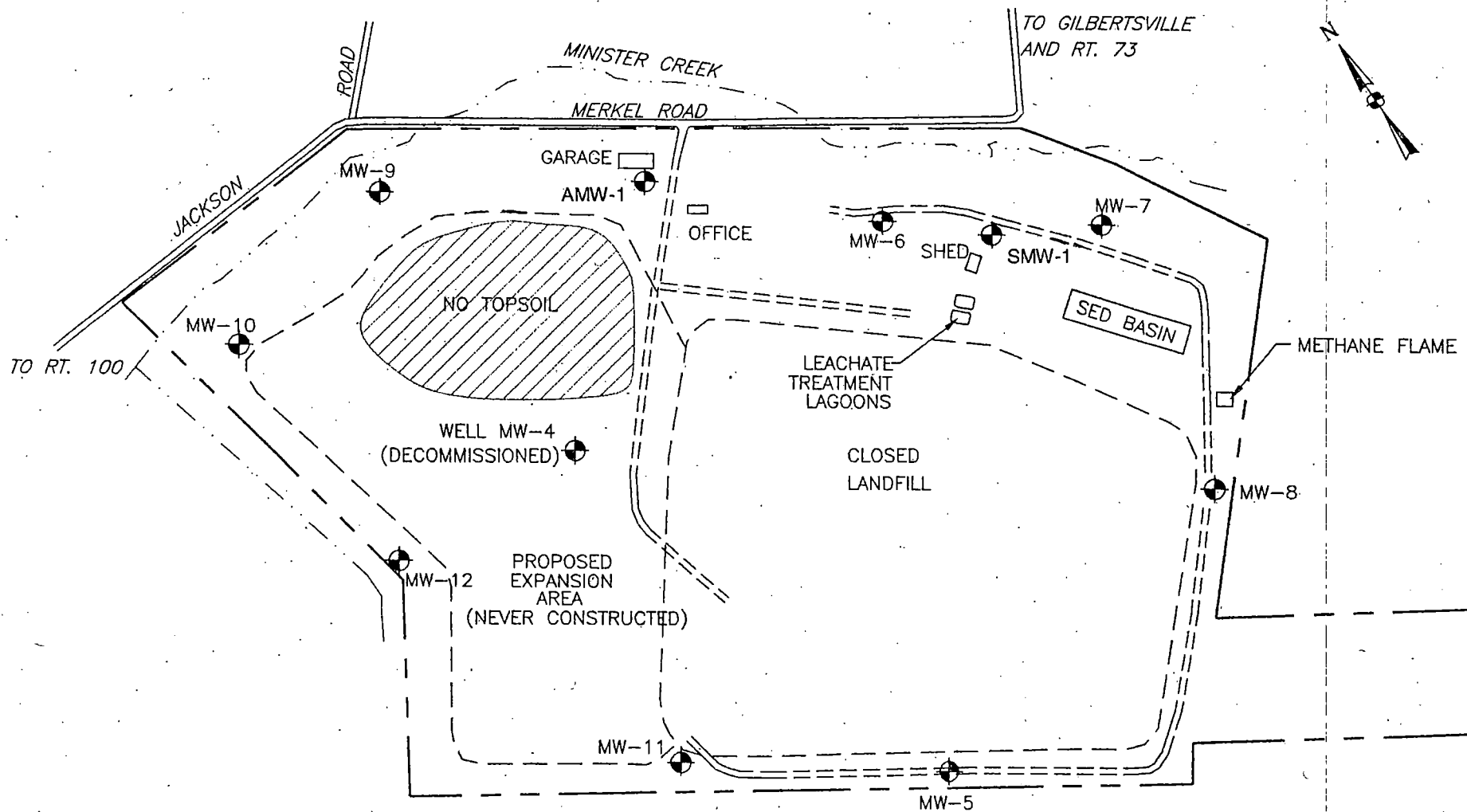
	Y/N
B. Evaluation of the Owner/Operator's Hydrogeologic Assessment	
1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:	
a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)?	N
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)?	N
c. Piezometer installation for water level measurements at different depths? d. Slug tests?	N
e. Pump tests?	N
f. Geochemical analyses of soil samples?	N
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis)	N
2. Did the owner/operator use the following indirect technique to supplement direct techniques data:	
a. Geophysical well logs?	N
b. Tracer studies?	N
c. Resistivity and/or electromagnetic conductance?	N
d. Seismic Survey?	N
e. Hydraulic conductivity measurements of cores?	N
f. Aerial photography?	N
g. Ground penetrating radar?	N
h. Other (specify)	N
3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment?	Y
4. Did the owner/operator document methods (criteria) used to correlate and analyze the information?	Y
5. The owner/operator prepare the following:	
a. Narrative description of geology?	Y
b. Geologic cross sections?	N
c. Geologic and soil maps?	N
d. Boring/coring logs?	N
e. Structure contour maps of the differing water bearing zones and confining layer?	N
f. Narrative description and calculation of ground-water flows?	Y

APPENDIX A

COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA. Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using Figure 4.3 from the COG as a guide.

Comprehensive Ground-Water Monitoring Evaluation	Y/N
I. Office Evaluation Technical Evaluation of the Design of the Ground-Water Monitoring System	
A. Review of Relevant Documents	
1. What documents were obtained prior to conducting the inspection:	
a. RCRA Part A permit application?	Y
b. RCRA Part B permit application?	Y
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	Y
d. Previously conducted facility inspection reports?	Y
e. Facility's contractor reports?	Y
f. Regional hydrogeologic, geologic, or soil reports?	Y
g. The facility's Sampling and Analysis Plan?	Y
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)?	Y
i. Other (specify) <u>Correspondence</u>	Y



NOT TO SCALE

Figure altered by PADEP to reflect current monitoring well designations.

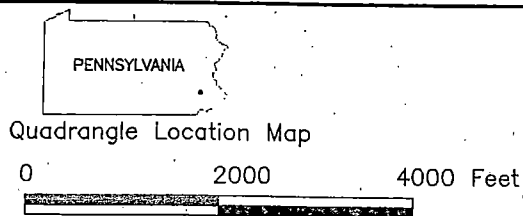
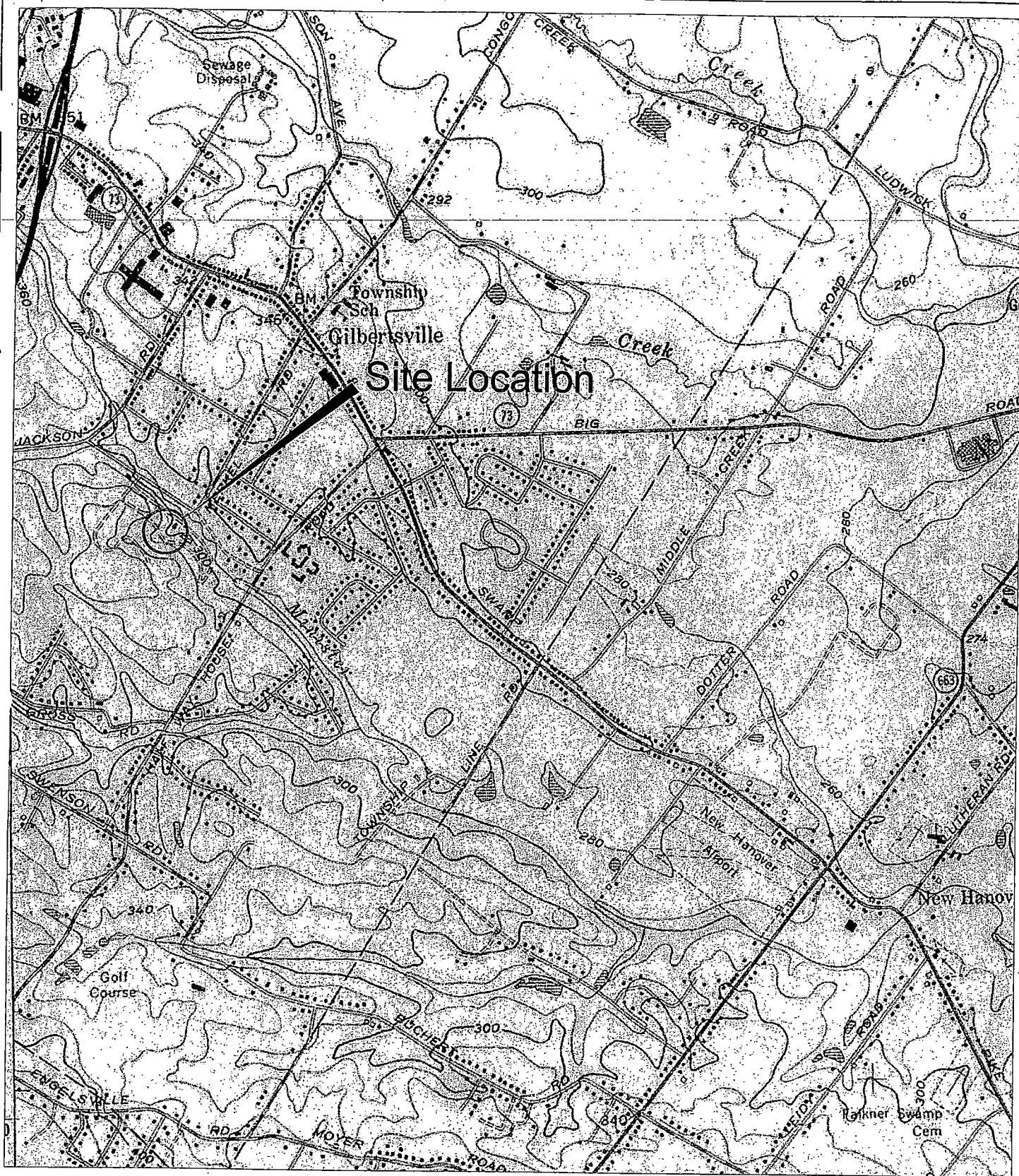
Commonwealth of Pennsylvania
Department of Environmental Protection

Boyertown Sanitary Disposal Landfill
Gilbertsville, PA

Figure 1-2
Monitoring Well Locations



TETRA TECH FW, INC.



Source: U.S.G.S. Topographic Maps (7.5 Minute)
Sassamansville, PA Quadrangle

Commonwealth of Pennsylvania
Department of Environmental Protection

Boyertown Sanitary Disposal Landfill
Gilbertsville, PA

Figure 1-1
Site Location Map

TETRA TECH FW, INC.
Formerly Foster Wheeler Environmental Corporation

**CME Inspection Report: Boyertown Sanitary Disposal Landfill (Gilbertsville,
Montgomery County)**

Performed on September 11, 2008

**Jennifer A. Wilson, Licensed Professional Geologist, PADEP Southeast Regional
Office**

The Boyertown Disposal Sanitary Landfill, located in Gilbertsville, PA, accepted waste, including some hazardous waste, from the 1970s through 1985. The landfill was finally capped in 1997. There have been many compliance issues at this facility. The landfill is currently in violation, not having conducted quarterly groundwater monitoring as required by its post-closure permit for a number of years. The PADEP was able to hire a contractor, Tetra Tech FW, to conduct a sampling event for a CME in 2004. There has been no groundwater sampling conducted at the facility since then. No sampling was conducted for this CME inspection. PADEP is currently assessing penalties against the owner of the landfill.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

RCRAinfo CM&E EVALUATION - VIOLATION FORM

*EPA ID Number		PAD048603005		EIN	
Handler Name		Bortown Sanitary Disposal Landfill			
Street		300 Market Road			
City	Gilbertsville	State	PA	Zip Code	19525
Actual Generator Status <small>Check only if different from Notified Status</small>		LQG <input type="checkbox"/>	SQG <input type="checkbox"/>	CESQG <input type="checkbox"/>	Closed <input checked="" type="checkbox"/> Non-Handler <input type="checkbox"/>
Universe Change Required? <small>(Generator Status Change Required)</small>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>If YES, complete the Universe Change Section (on reverse side of this form).</small>			
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>If YES, complete the Handler Section (on reverse side of this form).</small>			
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>If YES, complete the Handler Section (on reverse side of this form).</small>			
*EVALUATION		<input checked="" type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).	
*Evaluation Identifier	*Type	*Evaluation Start Date <small>(mm/dd/yy)</small>	*Agency	Responsible Person	Suborganization
	CME	09/11/08	PADEP	JAW	
<small>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.</small>		<small>Day Zero (mm/dd/yyyy):</small> <div style="border: 1px solid black; padding: 5px; display: inline-block;">09/11/2008</div>		<small>Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.</small> <div style="border: 1px solid black; width: 100px; height: 40px;"></div>	
		Notes:			
Evaluation Indicator Field (Check all that apply) <input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input checked="" type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C					
Focused Coverage Areas (Use Only for Evaluation Type FCI) <small>Regulation-Specific FCI</small> BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFJ <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify: _____) <small>Routine/Standardized FCI</small> CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>					
Does this Evaluation Add/Update/Delete a Violation?		YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.	
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAinfo 3007 Information Requests and Commitments Form.	
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAinfo 3007 Information Requests and Commitments Form.	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input type="checkbox"/> <small>If Yes, fill in information below.</small>					
*Seq. No.	*Violation Type	*Agency	*Regulation Citation <small>(Type + Citation) (ex. FR 262.1)</small>	*Date Determined <small>(mm/dd/yyyy)</small>	
	265.N	PADEP	40 CFR § 265.31(a)(6)(1)	09/11/2008	

*Required Fields